

# **WIOA State Plan for the State of Oklahoma Program Year 2020-2023**

## **Overview**

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and supports to help all job-seekers secure good jobs while providing businesses with the skilled workers they need to compete in the global economy. States must have approved Unified or Combined State Plans in place to receive funding for core programs. WIOA reforms planning requirements, previously governed by the Workforce Investment Act of 1998 (WIA), to foster better alignment of Federal investments in job training, to integrate service delivery across programs and improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. One of WIOA's principal areas of reform is to require States to plan across core programs and include this planning process in the Unified or Combined State Plans. This reform promotes a shared understanding of the workforce needs within each State and fosters the development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers. Successful implementation of many of these approaches called for within WIOA requires robust relationships across programs. WIOA requires States and local areas to enhance coordination and partnerships with local entities and supportive service agencies for strengthened service delivery, including through Unified or Combined State Plans.

## **Options for Submitting a State Plan**

A State has two options for submitting a State Plan— a Unified State Plan or a Combined State Plan. At a minimum, a State must submit a Unified State Plan that meets the requirements described in this document and outlines a four-year strategy for the core programs. The six core programs are -

- the Adult program (Title I of WIOA),
- the Dislocated program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and

- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under Title I of the Rehabilitation Act of 1973, as amended by Title IV).

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are -

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))<sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

## How State Plan Requirements Are Organized

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<sup>1</sup> States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances,
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, *Supplement to the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements*. The Departments are not seeking comments on these particular requirements).

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

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<sup>2</sup> Target populations include individuals with barriers to employment, as defined in WIOA Sec. 3, as well as veterans, unemployed workers, and youth.

# I. WIOA State Plan Type

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

- ✓ **Unified State Plan.** This plan includes the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program.
- ☐ **Combined State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below. Indicate which Combined State Plan partner program(s) the State is electing to include in the plan.
  - Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
  - Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
  - Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
  - Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o)))
  - Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
  - Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
  - Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
  - Senior Community Service Employment Program (Programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
  - Employment and training activities carried out by the Department of Housing and Urban Development
  - Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))
  - Reintegration of Ex-Offenders Program<sup>3</sup> (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

## Plan Introduction and Executive Summary

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<sup>3</sup> The Reentry Employment Opportunities program (REO), formerly the Reintegration of Ex-Offenders Program (RExO), is referred to by its original name (RExO) in this document. This name change is a recent decision that was not incorporated into WIOA.

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Oklahoma is pleased to present this Unified Strategic Four-year State Workforce Development Plan for the Workforce Innovation and Opportunity Act, administered by the Oklahoma Office of Workforce Development (OOWD), which is housed at the Oklahoma Department of Commerce. The Plan discusses the State's vision, goals, and strategies for carrying out WIOA programs administered by OOWD, the Wagner-Peyser Act (Title III) housed at the Oklahoma Employment Security Commission (OESC), the Adult Education and Literacy Program (Title II) housed at the Oklahoma Department of Career and Technology Education (ODCTE), and the Vocational Rehabilitation Program (Title I of the Rehabilitation Act of 1973 (as amended by Title IV) housed at the Oklahoma Department of Rehabilitation Services (DRS).

Supported by data, the plan highlights the state's priorities for building a strong talent pipeline and statewide economic development. The plan was created based on the vision, goals, and strategies identified by Governor J. Kevin Stitt and the Governor's Council for Workforce and Economic Development (GCWED or Governor's Council), which serves as the statewide workforce development board. OOWD also convened partners from OESC, DRS, and ODCTE to collaboratively discuss priority strategies in service of our customers. Leadership from each WIOA Core Partner program selected individuals to participate on a State Plan Committee. Those individuals met to jointly develop individual program components and joint components of the plan.

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## **II. Strategic Elements**

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

### **a. Economic, Workforce, and Workforce Development Activities Analysis**

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State’s workforce system and programs will operate.

## **1. Economic and Workforce Analysis (*See Attachment A*)**

### **A. Economic Analysis**

The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include -

#### **i. Existing Demand Industry Sectors and Occupations**

Provide an analysis of the industries and occupations for which there is existing demand.

#### **ii. Emerging Demand Industry Sectors and Occupation**

Provide an analysis of the industries and occupations for which demand is emerging.

#### **iii. Employers’ Employment Needs**

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

This section will provide an analysis of the industries and occupations for which there is existing demand in Oklahoma. The Oklahoma Office of Workforce Development partnered with the Oklahoma Department of Commerce to identify Oklahoma’s State-level Industry Clusters and Regional-Specific Industry Clusters. The Oklahoma Department of Commerce identified five key demand industry sectors, which we refer to in this state as Industry Clusters. We have identified these sectors / clusters as giving Oklahoma a competitive advantage in a global economy. They exhibit significant potential for employment growth, and provide wealth generating employment opportunities. The five State Industry Clusters’ demand industries produce or provide similar goods and services and therefore have similar needs in workforce, infrastructure, and economic development policy. The five State Industry Clusters are Aerospace & Defense, Agriculture & Biosciences, Energy, Information and Financial Services, and Transportation and Distribution.

State Industry Clusters	
1	Aerospace and Defense
2	Energy
3	Agriculture and Bioscience
4	Information and Financial Services
5	Transportation and Distribution

State Industry Clusters	Estimated Net Job Growth (2019-2024)	Industry Cluster Growth Rate (2019-2024)	Average Annual Earnings
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Aerospace and Defense	8,647	8%	\$71,736
Agriculture and Bioscience	3,350	4%	\$63,179
Energy	10,583	9%	\$109,730
Information and Financial Services	3,333	3%	\$85,131
Transportation and Distribution	7,653	6%	\$70,310

Source: EMSI 2019.4

### Aerospace & Defense

Oklahoma is one of seven global aerospace hubs and home to the largest military and commercial aircraft maintenance, repair and overhaul operations in the United States. In 2019 there were 123,680 jobs in the Aerospace & Defense Industry Cluster employs 5.2% of the state's workforce with average earnings of approximately \$68,103. Analysis of job growth due to economic demand estimates that total employment will increase to 133,018 jobs by 2024, an increase of 9,338 jobs for the state.

### Aerospace & Defense Existing Demand Industries

The following Industries are the top 10 in terms of total number of jobs in 2019.

NAICS	Description	2019 Jobs	Avg. Earnings Per Job
90120	Federal Government, Military	32,644	\$46,753
54161	Management Consulting Services	14,332	\$56,050
33641	Aerospace Product and Parts Manufacturing	13,239	\$111,441
54151	Computer Systems Design and Related Services	12,571	\$76,389
54133	Engineering Services	8,564	\$89,688
81131	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	5,433	\$62,870
33271	Machine Shops	5,342	\$56,221
33231	Plate Work and Fabricated Structural Product Manufacturing	4,182	\$71,234
48819	Other Support Activities for Air Transportation	3,715	\$82,047
61151	Technical and Trade Schools	3,095	\$51,896

Source: EMSI 2019.4

### Aerospace & Defense Existing Demand Occupations

The following Occupations are the top 10 in terms of total number of jobs in 2019.

SOC	Description	2019 Jobs	Median Hourly Earnings	Median Annual Earnings	Typical Entry Level Education	Work Experience Required	Typical On-The-Job Training
11-1021	General and Operations Managers	27,027	\$39.51	\$82,180.80	Bachelor's degree	5 years or more	None

11-9041	Architectural and Engineering Managers	2,033	\$60.10	\$125,008.00	Bachelor's degree	5 years or more	None
15-1133	Software Developers, Systems Software	1,825	\$42.14	\$87,651.20	Bachelor's degree	None	None
15-1132	Software Developers, Applications	4,560	\$40.82	\$84,905.60	Bachelor's degree	None	None
17-2141	Mechanical Engineers	2,939	\$40.48	\$84,198.40	Bachelor's degree	None	None
17-2072	Electronics Engineers, Except Computer	1,887	\$44.33	\$92,206.40	Bachelor's degree	None	None
17-2071	Electrical Engineers	1,438	\$46.08	\$95,846.40	Bachelor's degree	None	None
17-2199	Engineers, All Other	1,338	\$39.89	\$82,971.20	Bachelor's degree	None	None
51-9061	Inspectors, Testers, Sorters, Samplers, and Weighers	6,039	\$20.10	\$41,808.00	High school diploma or equivalent	None	Moderate-term on-the-job training
17-2112	Industrial Engineers	1,756	\$39.57	\$82,305.60	Bachelor's degree	None	None

Source: EMSI 2019.4

### Aerospace & Defense Emerging Demand Industries

The following are the Top 10 emerging industries in terms of number of new jobs in 2024

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change
33641	Aerospace Product and Parts Manufacturing	13,239	18,525	5,286	40%
54161	Management Consulting Services	14,332	15,630	1,298	9%
54151	Computer Systems Design and Related Services	12,571	13,868	1,297	10%
81131	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	5,433	6,195	762	14%
54133	Engineering Services	8,564	9,011	447	5%
54169	Other Scientific and Technical Consulting Services	3,072	3,510	438	14%
33271	Machine Shops	5,342	5,556	214	4%
48819	Other Support Activities for Air Transportation	3,715	3,925	210	6%
33231	Plate Work and Fabricated Structural Product Manufacturing	4,182	4,387	205	5%
33351	Metalworking Machinery Manufacturing	1,390	1,535	145	10%

Source: EMSI 2019.4

### Aerospace & Defense Emerging Demand Occupations

The following are the Top 10 emerging occupations in terms of number of new jobs in 2024.



SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Median Hourly Earnings	Median Annual Earnings
11-1021	General and Operations Managers	27,027	28,765	1,738	6%	\$39.51	\$82,180.80
15-1132	Software Developers, Applications	4,560	5,292	732	16%	\$40.82	\$84,905.60
13-1199	Business Operations Specialists, All Other	5,244	5,902	658	13%	\$34.19	\$71,115.20
51-2011	Aircraft Structure, Surfaces, Rigging, and Systems Assemblers	2,367	2,855	488	21%	\$22.86	\$47,548.80
51-1011	First-Line Supervisors of Production and Operating Workers	9,375	9,846	471	5%	\$27.69	\$57,595.20
51-4041	Machinists	5,331	5,791	460	9%	\$20.74	\$43,139.20
17-2112	Industrial Engineers	1,756	2,164	408	23%	\$39.57	\$82,305.60
43-5061	Production, Planning, and Expediting Clerks	6,493	6,866	373	6%	\$22.92	\$47,673.60
17-2141	Mechanical Engineers	2,939	3,303	364	12%	\$40.48	\$84,198.40
51-4011	Computer-Controlled Machine Tool Operators, Metal and Plastic	3,280	3,575	295	9%	\$18.42	\$38,313.60

Source: EMSI 2019.4

## Energy

In 2019 the Energy Industry Cluster accounted for 216,723 jobs with average earnings of \$80,860. Demand drives the cyclical nature of the Energy Industry Cluster hiring. The demand is expected to grow the industry cluster by 27,293 jobs, resulting in a total of 244,016 jobs in 2024. Extensive skills and training is required to work in the Energy Industry Cluster. These skills allow energy workers to transfer employment from one Industry Cluster to another.

## Energy

The following Industries are the top 10 in terms of total number of jobs in 2019.

NAICS	Description	2019 Jobs	Avg. Earnings Per Job
21112	Crude Petroleum Extraction	82,736	\$68,018
21311	Support Activities for Mining	41,270	\$85,595
21113	Natural Gas Extraction	30,561	\$75,605
23712	Oil and Gas Pipeline and Related Structures Construction	8,122	\$81,997
33313	Mining and Oil and Gas Field Machinery Manufacturing	7,667	\$81,820
33341	Ventilation, Heating, Air-Conditioning, and Commercial Refrigeration Equipment Manufacturing	6,073	\$64,019
22112	Electric Power Transmission, Control, and Distribution	4,669	\$116,134

33241	Power Boiler and Heat Exchanger Manufacturing	4,081	\$87,607
22121	Natural Gas Distribution	3,920	\$179,583
23713	Power and Communication Line and Related Structures Construction	3,548	\$66,270

Source: EMSI 2019.4

### Energy

The following Occupations are the top 10 in terms of total number of jobs in 2019.

SOC	Description	2019 Jobs	Median Hourly Earnings	Median Annual Earnings	Typical Entry Level Education	Work Experience Required	Typical On-The-Job Training
43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	32,439	\$14.71	\$30,596.80	High school diploma or equivalent	None	Short-term on-the-job training
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	\$13.49	\$28,059.20	No formal educational credential	None	Short-term on-the-job training
43-9061	Office Clerks, General	30,091	\$12.96	\$26,956.80	High school diploma or equivalent	None	Short-term on-the-job training
11-1021	General and Operations Managers	27,027	\$39.51	\$82,180.80	Bachelor's degree	5 years or more	None
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	\$20.07	\$41,745.60	Postsecondary nondegree award	None	Short-term on-the-job training
49-9071	Maintenance and Repair Workers, General	17,258	\$15.56	\$32,364.80	High school diploma or equivalent	None	Moderate-term on-the-job training
13-2011	Accountants and Auditors	14,301	\$31.27	\$65,041.60	Bachelor's degree	None	None
51-2098	Assemblers and Fabricators, All Other, Including Team Assemblers	11,782	\$14.81	\$30,804.80	High school diploma or equivalent	None	Moderate-term on-the-job training
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	10,037	\$30.39	\$63,211.20	High school diploma or equivalent	5 years or more	None
41-4012	Sales Representatives, Wholesale and Manufacturing, Except	9,742	\$22.98	\$47,798.40	High school diploma or equivalent	None	Moderate-term on-the-job training

	Technical and Scientific Products						
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Source: EMSI 2019.4

### Energy

The following are the Top 10 emerging industries in terms of number of new jobs in 2024

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change
21112	Crude Petroleum Extraction	82,736	93,198	10,462	13%
21311	Support Activities for Mining	41,270	48,720	7,450	18%
21113	Natural Gas Extraction	30,561	35,265	4,704	15%
23712	Oil and Gas Pipeline and Related Structures Construction	8,122	11,123	3,001	37%
23713	Power and Communication Line and Related Structures Construction	3,548	4,129	581	16%
33313	Mining and Oil and Gas Field Machinery Manufacturing	7,667	7,997	330	4%
22112	Electric Power Transmission, Control, and Distribution	4,669	4,944	275	6%
33241	Power Boiler and Heat Exchanger Manufacturing	4,081	4,349	268	7%
33291	Metal Valve Manufacturing	2,851	3,097	246	9%
48621	Pipeline Transportation of Natural Gas	1,402	1,567	165	12%

Source: EMSI 2019.4

### Energy

The following are the Top 10 emerging occupations in terms of number of new jobs in 2024.

SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Median Hourly Earnings	Median Annual Earnings
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	33,034	2,352	8%	\$13.49	\$28,059.20
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	28,909	2,163	8%	\$20.07	\$41,745.60
11-1021	General and Operations Managers	27,027	28,765	1,738	6%	\$39.51	\$82,180.80
13-2011	Accountants and Auditors	14,301	15,622	1,321	9%	\$31.27	\$65,041.60
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	10,037	11,113	1,076	11%	\$30.39	\$63,211.20
49-9071	Maintenance and Repair Workers, General	17,258	18,304	1,046	6%	\$15.56	\$32,364.80
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	9,742	10,604	862	9%	\$22.98	\$47,798.40
47-5071	Roustabouts, Oil and Gas	5,774	6,629	855	15%	\$18.61	\$38,708.80
47-2073	Operating Engineers and Other Construction Equipment Operators	6,713	7,528	815	12%	\$18.60	\$38,688.00
47-5013	Service Unit Operators, Oil, Gas, and Mining	2,962	3,578	616	21%	\$19.44	\$40,435.20

Source: EMSI 2019.4

### Agriculture & Biosciences

Jobs within the Agriculture & Biosciences Industry Cluster totaled 167,412 jobs in Oklahoma, with average earnings of \$46,254.

### Agriculture & Biosciences

The following Industries are the top 10 in terms of total number of jobs in 2019.

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
11200	Animal Production	54,431	53,995	(436)	(1%)	\$31,926
11100	Crop Production	24,959	25,662	703	3%	\$24,855
54199	All Other Professional, Scientific, and Technical Services	12,013	12,602	589	5%	\$48,596
31161	Animal Slaughtering and Processing	8,912	9,268	356	4%	\$49,117
54133	Engineering Services	8,564	9,011	447	5%	\$89,688
11511	Support Activities for Crop Production	5,554	5,949	395	7%	\$29,110

54194	Veterinary Services	5,387	5,893	506	9%	\$39,084
62151	Medical and Diagnostic Laboratories	3,176	3,687	511	16%	\$69,767
33451	Navigational, Measuring, Electromedical, and Control Instruments Manufacturing	2,622	2,670	48	2%	\$90,167
31181	Bread and Bakery Product Manufacturing	2,487	2,508	21	1%	\$44,419

Source: EMSI 2019.4

### Agriculture & Biosciences

The following Occupations are the top 10 in terms of total number of jobs in 2019.

SOC	Description	2019 Jobs	Median Hourly Earnings	Median Annual Earnings	Typical Entry Level Education	Work Experience Required	Typical On-The-Job Training
43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	32,439	\$14.71	\$30,596.80	High school diploma or equivalent	None	Short-term on-the-job training
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	\$13.49	\$28,059.20	No formal educational credential	None	Short-term on-the-job training
43-4051	Customer Service Representatives	30,169	\$14.62	\$30,409.60	High school diploma or equivalent	None	Short-term on-the-job training
43-9061	Office Clerks, General	30,091	\$12.96	\$26,956.80	High school diploma or equivalent	None	Short-term on-the-job training
11-1021	General and Operations Managers	27,027	\$39.51	\$82,180.80	Bachelor's degree	5 years or more	None
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	\$20.07	\$41,745.60	Postsecondary nondegree award	None	Short-term on-the-job training
43-3031	Bookkeeping, Accounting, and Auditing Clerks	23,261	\$17.88	\$37,190.40	Some college, no degree	None	Moderate-term on-the-job training
43-5081	Stock Clerks and Order Fillers	20,683	\$11.55	\$24,024.00	High school diploma or equivalent	None	Short-term on-the-job training

49-9071	Maintenance and Repair Workers, General	17,258	\$15.56	\$32,364.80	High school diploma or equivalent	None	Moderate-term on-the-job training
41-3099	Sales Representatives, Services, All Other	9,507	\$21.76	\$45,260.80	High school diploma or equivalent	None	Moderate-term on-the-job training

Source: EMSI 2019.4

### Agriculture & Biosciences

The following are the Top 10 emerging industries in terms of number of new jobs in 2024

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
11100	Crop Production	24,959	25,662	703	3%	\$24,855
54199	All Other Professional, Scientific, and Technical Services	12,013	12,602	589	5%	\$48,596
62151	Medical and Diagnostic Laboratories	3,176	3,687	511	16%	\$69,767
54194	Veterinary Services	5,387	5,893	506	9%	\$39,084
54133	Engineering Services	8,564	9,011	447	5%	\$89,688
11511	Support Activities for Crop Production	5,554	5,949	395	7%	\$29,110
31161	Animal Slaughtering and Processing	8,912	9,268	356	4%	\$49,117
42481	Beer and Ale Merchant Wholesalers	1,472	1,743	271	18%	\$56,893
32541	Pharmaceutical and Medicine Manufacturing	771	924	153	20%	\$108,283
42449	Other Grocery and Related Products Merchant Wholesalers	2,229	2,370	141	6%	\$58,585

Source: EMSI 2019.4

### Agriculture & Biosciences Emerging Demand Occupations

SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Median Hourly Earnings	Median Annual Earnings
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	33,034	2,352	8%	\$13.49	\$28,059.20
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	28,909	2,163	8%	\$20.07	\$41,745.60
11-1021	General and Operations Managers	27,027	28,765	1,738	6%	\$39.51	\$82,180.80

49-9071	Maintenance and Repair Workers, General	17,258	18,304	1,046	6%	\$15.56	\$32,364.80
43-5081	Stock Clerks and Order Fillers	20,683	21,380	697	3%	\$11.55	\$24,024.00
13-1199	Business Operations Specialists, All Other	5,244	5,902	658	13%	\$34.19	\$71,115.20
43-9061	Office Clerks, General	30,091	30,616	525	2%	\$12.96	\$26,956.80
37-3011	Landscaping and Groundskeeping Workers	8,222	8,727	505	6%	\$12.47	\$25,937.60
41-3099	Sales Representatives, Services, All Other	9,507	9,943	436	5%	\$21.76	\$45,260.80
49-1011	First-Line Supervisors of Mechanics, Installers, and Repairers	7,281	7,657	376	5%	\$31.44	\$65,395.20

Source: EMSI 2019.4

#### Information & Financial Services

There were 164,236 jobs in the Information & Financial Services Industry Cluster in 2019 with average wages of \$68,805. Growth in the Industry Cluster is projected to increase by 10,496 jobs by 2024, a total of 174,732 jobs in Oklahoma.

#### Information & Financial Services

The following Industries are the top 10 in terms of total number of jobs in 2019.

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
55111	Management of Companies and Enterprises	24,781	27,479	2,698	11%	\$107,570
54121	Accounting, Tax Preparation, Bookkeeping, and Payroll Services	20,846	22,748	1,902	9%	\$64,582
52211	Commercial Banking	20,722	20,516	(206)	(1%)	\$69,908
52392	Portfolio Management	12,714	15,089	2,375	19%	\$36,859
54151	Computer Systems Design and Related Services	12,571	13,868	1,297	10%	\$76,389
51731	Wired and Wireless Telecommunications Carriers	8,822	7,551	(1,271)	(14%)	\$79,523
52391	Miscellaneous Intermediation	8,024	8,673	649	8%	\$37,913
52393	Investment Advice	6,281	6,983	702	11%	\$41,300
52229	Other Nondepository Credit Intermediation	6,190	6,842	652	11%	\$54,466
52592	Trusts, Estates, and Agency Accounts	5,983	7,007	1,024	17%	\$43,418

Source: EMSI 2019.4

### Information & Financial Services

The following Occupations are the top 10 in terms of total number of jobs in 2019.

SOC	Description	2019 Jobs	Median Hourly Earnings	Median Annual Earnings	Typical Entry Level Education	Work Experience Required	Typical On-The-Job Training
43-4051	Customer Service Representatives	30,169	\$14.62	\$30,409.60	High school diploma or equivalent	None	Short-term on-the-job training
11-1021	General and Operations Managers	27,027	\$39.51	\$82,180.80	Bachelor's degree	5 years or more	None
13-2011	Accountants and Auditors	14,301	\$31.27	\$65,041.60	Bachelor's degree	None	None
43-4171	Receptionists and Information Clerks	9,379	\$13.23	\$27,518.40	High school diploma or equivalent	None	Short-term on-the-job training
41-3021	Insurance Sales Agents	9,060	\$22.08	\$45,926.40	High school diploma or equivalent	None	Moderate-term on-the-job training
43-3071	Tellers	6,845	\$12.08	\$25,126.40	High school diploma or equivalent	None	Short-term on-the-job training
11-3031	Financial Managers	6,550	\$46.43	\$96,574.40	Bachelor's degree	5 years or more	None
13-1111	Management Analysts	4,796	\$35.97	\$74,817.60	Bachelor's degree	Less than 5 years	None
15-1132	Software Developers, Applications	4,560	\$40.82	\$84,905.60	Bachelor's degree	None	None
13-2072	Loan Officers	3,964	\$29.44	\$61,235.20	Bachelor's degree	None	Moderate-term on-the-job training

Source: EMSI 2019.4

### Information & Financial Services

The following are the Top 10 emerging industries in terms of number of new jobs in 2024.

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
55111	Management of Companies and Enterprises	24,781	27,479	2,698	11%	\$107,570
52392	Portfolio Management	12,714	15,089	2,375	19%	\$36,859
54121	Accounting, Tax Preparation, Bookkeeping, and Payroll Services	20,846	22,748	1,902	9%	\$64,582
54151	Computer Systems Design and Related Services	12,571	13,868	1,297	10%	\$76,389
52592	Trusts, Estates, and Agency Accounts	5,983	7,007	1,024	17%	\$43,418



52393	Investment Advice	6,281	6,983	702	11%	\$41,300
52229	Other Nondepository Credit Intermediation	6,190	6,842	652	11%	\$54,466
52391	Miscellaneous Intermediation	8,024	8,673	649	8%	\$37,913
52399	All Other Financial Investment Activities	3,639	3,857	218	6%	\$37,303
52213	Credit Unions	3,552	3,746	194	5%	\$51,033

Source: EMSI 2019.4

### Information & Financial Services

The following are the Top 10 emerging occupations in terms of number of new jobs in 2024.

SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Median Hourly Earnings	Median Annual Earnings
11-1021	General and Operations Managers	27,027	28,765	1,738	6%	\$39.51	\$82,180.80
13-2011	Accountants and Auditors	14,301	15,622	1,321	9%	\$31.27	\$65,041.60
15-1132	Software Developers, Applications	4,560	5,292	732	16%	\$40.82	\$84,905.60
11-3031	Financial Managers	6,550	7,261	711	11%	\$46.43	\$96,574.40
41-3021	Insurance Sales Agents	9,060	9,719	659	7%	\$22.08	\$45,926.40
43-4171	Receptionists and Information Clerks	9,379	9,942	563	6%	\$13.23	\$27,518.40
13-1111	Management Analysts	4,796	5,213	417	9%	\$35.97	\$74,817.60
43-4051	Customer Service Representatives	30,169	30,459	290	1%	\$14.62	\$30,409.60
15-1133	Software Developers, Systems Software	1,825	2,106	281	15%	\$42.14	\$87,651.20
15-1121	Computer Systems Analysts	3,397	3,627	230	7%	\$37.57	\$78,145.60

Source: EMSI 2019.4

### Transportation & Distribution

In 2019 there were 135,225 jobs in the Transportation & Distribution Industry Cluster with average earnings of \$68,667. Based on demand projections jobs within the Industry Cluster will increase by 7,837 jobs totaling 143,091 jobs by the year 2024.

### Transportation & Distribution

The following Industries are the top 10 in terms of total number of jobs in 2019.

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
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48412	General Freight Trucking, Long-Distance	16,491	16,789	298	2%	\$64,511
49311	General Warehousing and Storage	12,950	16,181	3,231	25%	\$41,057
42512	Wholesale Trade Agents and Brokers	7,564	8,400	836	11%	\$60,862
42383	Industrial Machinery and Equipment Merchant Wholesalers	6,733	7,114	381	6%	\$83,603
32621	Tire Manufacturing	4,411	3,986	(425)	(10%)	\$83,831
48422	Specialized Freight (except Used Goods) Trucking, Local	4,099	4,449	350	9%	\$70,289
48411	General Freight Trucking, Local	3,868	3,628	(240)	(6%)	\$66,253
48819	Other Support Activities for Air Transportation	3,715	3,925	210	6%	\$82,047
33621	Motor Vehicle Body and Trailer Manufacturing	3,123	3,297	174	6%	\$47,726
48423	Specialized Freight (except Used Goods) Trucking, Long-Distance	2,867	3,278	411	14%	\$89,560

Source: EMSI 2019.4

### Transportation & Distribution

The following Occupations are the top 10 in terms of total number of jobs in 2019.

<b>SOC</b>	<b>Description</b>	<b>2019 Jobs</b>	<b>Median Hourly Earnings</b>	<b>Median Annual Earnings</b>	<b>Typical Entry Level Education</b>	<b>Work Experience Required</b>	<b>Typical On-The-Job Training</b>
43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	32,439	\$14.71	\$30,596.80	High school diploma or equivalent	None	Short-term on-the-job training
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	\$13.49	\$28,059.20	No formal educational credential	None	Short-term on-the-job training
43-4051	Customer Service Representatives	30,169	\$14.62	\$30,409.60	High school diploma or equivalent	None	Short-term on-the-job training
43-9061	Office Clerks, General	30,091	\$12.96	\$26,956.80	High school diploma or equivalent	None	Short-term on-the-job training
11-1021	General and Operations Managers	27,027	\$39.51	\$82,180.80	Bachelor's degree	5 years or more	None
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	\$20.07	\$41,745.60	Postsecondary nondegree award	None	Short-term on-the-job training
43-3031	Bookkeeping, Accounting, and Auditing Clerks	23,261	\$17.88	\$37,190.40	Some college, no degree	None	Moderate-term on-the-job training

43-5081	Stock Clerks and Order Fillers	20,683	\$11.55	\$24,024.00	High school diploma or equivalent	None	Short-term on-the-job training
13-2011	Accountants and Auditors	14,301	\$31.27	\$65,041.60	Bachelor's degree	None	None
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	9,742	\$22.98	\$47,798.40	High school diploma or equivalent	None	Moderate-term on-the-job training

Source: EMSI 2019.4

### Transportation & Distribution

The following are the Top 10 emerging industries in terms of number of new jobs in 2024.

NAICS	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Avg. Earnings Per Job
49311	General Warehousing and Storage	12,950	16,181	3,231	25%	\$41,057
42512	Wholesale Trade Agents and Brokers	7,564	8,400	836	11%	\$60,862
48423	Specialized Freight (except Used Goods) Trucking, Long-Distance	2,867	3,278	411	14%	\$89,560
42383	Industrial Machinery and Equipment Merchant Wholesalers	6,733	7,114	381	6%	\$83,603
48422	Specialized Freight (except Used Goods) Trucking, Local	4,099	4,449	350	9%	\$70,289
48412	General Freight Trucking, Long-Distance	16,491	16,789	298	2%	\$64,511
42311	Automobile and Other Motor Vehicle Merchant Wholesalers	1,604	1,877	273	17%	\$77,576
42481	Beer and Ale Merchant Wholesalers	1,472	1,743	271	18%	\$56,893
42351	Metal Service Centers and Other Metal Merchant Wholesalers	2,470	2,705	235	10%	\$74,459
48851	Freight Transportation Arrangement	1,557	1,779	222	14%	\$49,259

Source: EMSI 2019.4

### Transportation & Distribution

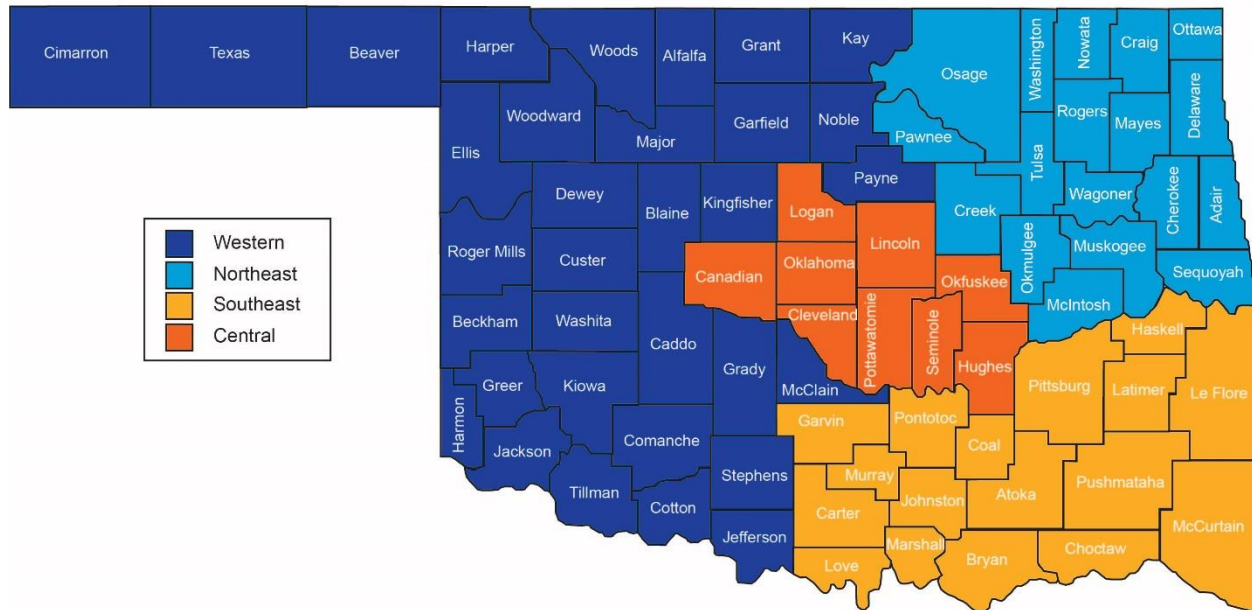
The following are the Top 10 emerging occupations in terms of number of new jobs in 2024.

SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 Change	2019 - 2024 % Change	Median Hourly Earnings	Median Annual Earnings
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	33,034	2,352	8%	\$13.49	\$28,059.20

53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	28,909	2,163	8%	\$20.07	\$41,745.60
11-1021	General and Operations Managers	27,027	28,765	1,738	6%	\$39.51	\$82,180.80
13-2011	Accountants and Auditors	14,301	15,622	1,321	9%	\$31.27	\$65,041.60
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	9,742	10,604	862	9%	\$22.98	\$47,798.40
15-1132	Software Developers, Applications	4,560	5,292	732	16%	\$40.82	\$84,905.60
53-7051	Industrial Truck and Tractor Operators	7,209	7,932	723	10%	\$16.57	\$34,465.60
43-5081	Stock Clerks and Order Fillers	20,683	21,380	697	3%	\$11.55	\$24,024.00
13-1199	Business Operations Specialists, All Other	5,244	5,902	658	13%	\$34.19	\$71,115.20
13-1161	Market Research Analysts and Marketing Specialists	5,088	5,737	649	13%	\$25.72	\$53,497.60

Source: EMSI 2019.4

## OKLAHOMA FOUR PLANNING REGIONS



## Planning Region Industry Clusters

Per federal regulations, Oklahoma has established four separate planning regions consisting of counties based on geographic location and competitive advantage due to demand industries. Planning regions are named based on their geographic position in the state: Central, Northeast, Southeast and Western. The Oklahoma Department of Commerce identified demand Industry Clusters and the regional and local levels. There are also occupations and industries that have a significant footprint in terms of growth and employment. These jobs are not always included in the industry clusters as they offer low wages and require little training.

Planning Region	Workforce Development Area	Regional Industry Clusters
Northeast	Northeast	Industrial Transportation & Distribution Mining & Extraction STEM Healthcare
Northeast	Eastern	Industrial Transportation & Distribution Utilities Generation, Transmission & Energy Pipelines Professional Services Healthcare STEM
Northeast	Tulsa	Industrial Transportation & Distribution Mining & Extraction Professional Services Healthcare

		STEM
<b>Western</b>	<b>Western</b>	Industrial Transportation & Distribution Mining & Extraction Professional Services Healthcare STEM
<b>Western</b>	<b>South Central</b>	Industrial Transportation & Distribution Mining & Extraction Professional Services Healthcare STEM
<b>Southeast</b>	<b>Southern</b>	Industrial Transportation & Distribution Mining & Extraction Professional Services Healthcare STEM
<b>Central</b>	<b>Central</b>	Industrial Transportation & Distribution Mining & Extraction Professional Services Healthcare STEM

*Source: Oklahoma Department of Commerce, December 2019*

### **The Northeast Planning Region**

The Northeast Oklahoma Planning Region is made up of the following 18 counties: Adair, Cherokee, Craig, Creek, Delaware, Mayes, McIntosh, Muskogee, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Rogers, Sequoyah, Tulsa, Wagoner and Washington. This area varies from being densely populated in and around Tulsa, to more rural in the north and east. Three Workforce Development Areas are represented in the Northeast Planning Region: Northeast, Eastern, and Tulsa. Regional Industry Clusters in this area include Industrial, Transportation & Distribution, Utilities Generation, Transmission & Energy Pipelines, Professional Services, Healthcare, Mining & Extraction, and STEM.

### **The Central Planning Region**

The Central Oklahoma Planning Region is made up of nine counties: Canadian, Cleveland, Hughes, Lincoln, Logan, Okfuskee, Oklahoma, Pottawatomie, and Seminole. One Workforce Development Area represents the Central Planning Region: Central. Regional Industry Clusters in this area include: Industrial, Transportation & Distribution, Mining & Extraction, Professional Services, Healthcare, and STEM.

### **The Western Planning Region**

The Western planning region is comprised of thirty-three counties in the western half of the state, nearly all of them are west of I-35. The Western Planning Region is the largest of the four and encompasses the remaining 33 counties in Oklahoma: Alfalfa, Beaver, Beckham, Blaine, Caddo, Cimarron, Comanche, Cotton, Custer, Dewey, Ellis, Garfield, Grady, Grant, Greer, Harmon, Harper, Jackson, Jefferson, Kay, Kingfisher, Kiowa, Major, McClain, Noble, Payne, Roger Mills, Stephens, Texas, Tillman, Washita, Woods, and Woodward. Two Workforce Development Areas represent the Western Planning Region: Western and South Central. Regional Industry Clusters in this area include: Industrial, Transportation & Distribution, Mining & Extraction, Professional Services, Healthcare, and STEM.

### **The Southeast Planning Region**

The Southeast planning region is comprised of seventeen counties in southeast Oklahoma, primarily south of I-40 and either on or east of I-35. The Southeast Planning Region consists of the following

counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc, and Pushmataha. One Workforce Development Area represents the Southeast Planning Region: Southern. Regional Industry Clusters in this area include: Industrial, Transportation & Distribution, Mining & Extraction, Professional Services, Healthcare, and STEM.

### Strategy

The Oklahoma Works initiative strives to ensure that existing and new businesses in the state are successful and that Oklahoma residents have the ability to obtain work in occupations that generate family sustaining wages. A large majority of the emerging occupations require nothing more than a high school diploma or the equivalent. This level of education and the skills one possesses from this level, will not allow Oklahomans or Oklahoma's economy to thrive, which is why the occupations within the emerging industries must be analyzed and targeted strategically.

There are 18 emerging industries that cover each of the four planning regions as well as the state as a whole, within those 18 industries there are several occupations with highly projected growth. By analyzing occupations that require at least a postsecondary non-degree award and choosing to focus our efforts on careers requiring that level of education at a minimum, Oklahoma can expect more than 472,330 jobs by 2020 with average hourly wages of \$29.33 which equates to average annual earnings of just over \$61,000.

### Employers Employment Needs

This section will describe the employment needs of employer's in Oklahoma. The state is determined to focus our efforts and partnerships on providing the services necessary to ensure that Oklahomans have the knowledge, skills and abilities needed to obtain employment in high-wage occupations within the established emerging industries.

Across the 5 State Industry Clusters, there are 33 emerging occupations. Some of the occupations are categorized under more than one Industry Cluster. Eleven of the emerging occupations require a Bachelor's Degree, sixteen require a High School Diploma or Equivalent, and one requires Postsecondary nondegree award. The remaining occupations do not require formal education and require on-the-job-training.

SOC	Description	2019 Jobs	2024 Jobs	2019 - 2024 % Change	Typical Entry Level Education	Work Experience Required	Typical On-The-Job Training	Regional Completions (2018)
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	30,682	33,034	8%	No formal educational credential	None	Short-term on-the-job training	0
43-9061	Office Clerks, General	30,091	30,616	2%	High school diploma or equivalent	None	Short-term on-the-job training	13
43-4051	Customer Service Representatives	30,169	30,459	1%	High school diploma or equivalent	None	Short-term on-the-job training	9
53-3032	Heavy and Tractor-Trailer Truck Drivers	26,746	28,909	8%	Postsecondary nondegree award	None	Short-term on-the-job training	370

11-1021	General and Operations Managers	27,027	28,765	6%	Bachelor's degree	5 years or more	None	3,890
43-5081	Stock Clerks and Order Fillers	20,683	21,380	3%	High school diploma or equivalent	None	Short-term on-the-job training	0
49-9071	Maintenance and Repair Workers, General	17,258	18,304	6%	High school diploma or equivalent	None	Moderate-term on-the-job training	126
13-2011	Accountants and Auditors	14,301	15,622	9%	Bachelor's degree	None	None	1,009
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	10,037	11,113	11%	High school diploma or equivalent	5 years or more	None	844
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	9,742	10,604	9%	High school diploma or equivalent	None	Moderate-term on-the-job training	76
41-3099	Sales Representatives, Services, All Other	9,507	9,943	5%	High school diploma or equivalent	None	Moderate-term on-the-job training	66
43-4171	Receptionists and Information Clerks	9,379	9,942	6%	High school diploma or equivalent	None	Short-term on-the-job training	13
51-1011	First-Line Supervisors of Production and Operating Workers	9,375	9,846	5%	High school diploma or equivalent	Less than 5 years	None	39
41-3021	Insurance Sales Agents	9,060	9,719	7%	High school diploma or equivalent	None	Moderate-term on-the-job training	6



37-3011	Landscaping and Groundskeeping Workers	8,222	8,727	6%	No formal educational credential	None	Short-term on-the-job training	3
53-7051	Industrial Truck and Tractor Operators	7,209	7,932	10%	No formal educational credential	None	Short-term on-the-job training	0
49-1011	First-Line Supervisors of Mechanics, Installers, and Repairers	7,281	7,657	5%	High school diploma or equivalent	Less than 5 years	None	41
47-2073	Operating Engineers and Other Construction Equipment Operators	6,713	7,528	12%	High school diploma or equivalent	None	Moderate-term on-the-job training	93
11-3031	Financial Managers	6,550	7,261	11%	Bachelor's degree	5 years or more	None	741
43-5061	Production, Planning, and Expediting Clerks	6,493	6,866	6%	High school diploma or equivalent	None	Moderate-term on-the-job training	0
47-5071	Roustabouts, Oil and Gas	5,774	6,629	15%	No formal educational credential	None	Moderate-term on-the-job training	0
13-1199	Business Operations Specialists, All Other	5,244	5,902	13%	Bachelor's degree	None	None	76
51-4041	Machinists	5,331	5,791	9%	High school diploma or equivalent	None	Long-term on-the-job training	125
13-1161	Market Research Analysts and Marketing Specialists	5,088	5,737	13%	Bachelor's degree	None	None	761
15-1132	Software Developers, Applications	4,560	5,292	16%	Bachelor's degree	None	None	697
13-1111	Management Analysts	4,796	5,213	9%	Bachelor's degree	Less than 5 years	None	3,698

15-1121	Computer Systems Analysts	3,397	3,627	7%	Bachelor's degree	None	None	933
47-5013	Service Unit Operators, Oil, Gas, and Mining	2,962	3,578	21%	No formal educational credential	None	Moderate-term on-the-job training	0
51-4011	Computer-Controlled Machine Tool Operators, Metal and Plastic	3,280	3,575	9%	High school diploma or equivalent	None	Moderate-term on-the-job training	132
17-2141	Mechanical Engineers	2,939	3,303	12%	Bachelor's degree	None	None	630
51-2011	Aircraft Structure, Surfaces, Rigging, and Systems Assemblers	2,367	2,855	21%	High school diploma or equivalent	None	Moderate-term on-the-job training	194
17-2112	Industrial Engineers	1,756	2,164	23%	Bachelor's degree	None	None	212
15-1133	Software Developers, Systems Software	1,825	2,106	15%	Bachelor's degree	None	None	720

## B. Workforce Analysis

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.<sup>4</sup> This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes -

### i. Employment and Unemployment

<sup>4</sup> Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and longterm unemployed individuals.

<sup>5</sup> Veterans, unemployed workers, and youth, and others that the State may identify.

Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

## ii. Labor Market Trends

Provide an analysis of key labor market trends, including across existing industries and occupations.

## iii. Education and Skill Levels of the Workforce

Provide an analysis of the educational and skill levels of the workforce.

## iv. Skill Gaps

Describe apparent ‘skill gaps’.

### Oklahoma’s Changing Population

<b>Race/Ethnicity</b>	<b>2019 Population</b>	<b>2024 Population</b>	<b>Change</b>	<b>% Change</b>
White, Non-Hispanic	2,574,390	2,557,952	-16,438	-1%
White, Hispanic	357,390	391,141	33,751	9%
American Indian or Alaskan Native, Non-Hispanic	330,747	338,009	7,262	2%
Black, Non-Hispanic	294,968	301,000	6,032	2%
Two or More Races, Non-Hispanic	224,783	240,227	15,444	7%
Asian, Non-Hispanic	91,934	99,575	7,641	8%
American Indian or Alaskan Native, Hispanic	40,190	44,494	4,304	11%
Two or More Races, Hispanic	24,504	27,508	3,004	12%
Black, Hispanic	14,427	15,830	1,403	10%
Native Hawaiian or Pacific Islander, Non-Hispanic	6,278	6,966	688	11%
Asian, Hispanic	2,946	3,228	282	10%
Native Hawaiian or Pacific Islander, Hispanic	1,497	1,602	105	7%
<b>Total</b>	<b>3,964,054</b>	<b>4,027,533</b>	<b>63,479</b>	<b>2%</b>

Source: EMSI 2019.4

Gender	2019 Population	2024 Population	Change	% Change
Females	2,000,387	2,032,084	31,697	2%

Males	1,963,668	1,995,449	31,781	2%
<b>Total</b>	<b>3,964,054</b>	<b>4,027,533</b>	<b>63,479</b>	<b>2%</b>

Source: EMSI 2019.4

In the 5-year projections beginning in 2019 and ending in 2024 the ethnicity with the highest percentage growth is Two or More Races, Hispanic growing by 12%, from 24,504 to 27,508, and in terms of total population growth it is White, Hispanic with a population increase of 33,751.

The second highest percentage growth is a tie of American Indian or Alaskan Native, Hispanic and Native Hawaiian or Pacific Islander, Non-Hispanic both at an expected growth rate of 11%, and in total population growth it is Two or More Races, Non-Hispanic with a population increase of 15,444.

For the entire population of Oklahoma the group most represented is White, Non-Hispanic with a population of 2,574,390 and an expected decline in growth of -16,438 in 2024. The next largest population is White, Hispanic with a current population of 357,390 and expected growth of 33,751.

Oklahoma's population is currently at 3,964,054, and there is expected increase to 4,027,533 in 2024, this is an increase of 63,479 or 1.6%.

Timeframe	Population
2014	3,878,345
2015	3,909,811
2016	3,926,760
2017	3,932,640
2018	3,943,078
2019	3,964,054
2020	3,979,071
2021	3,992,835
2022	4,005,454
2023	4,016,999
2024	4,027,533

Source: EMSI 2019.4

Age Cohort	2019 Population	2024 Population	Change	% Change
Under 5 years	263,960	282,480	18,520	7%
5 to 9 years	267,399	261,797	-5,602	-2%
10 to 14 years	271,538	269,276	-2,262	-1%
15 to 19 years	266,808	274,514	7,706	3%
20 to 24 years	270,988	275,562	4,574	2%
25 to 29 years	280,079	255,381	-24,698	-9%
30 to 34 years	265,362	281,235	15,873	6%
35 to 39 years	263,846	259,829	-4,017	-2%
40 to 44 years	232,674	260,468	27,794	12%
45 to 49 years	231,740	227,038	-4,702	-2%
50 to 54 years	225,011	226,368	1,357	1%
55 to 59 years	250,195	216,387	-33,808	-14%
60 to 64 years	241,758	237,000	-4,758	-2%

65 to 69 years	204,053	224,711	20,658	10%
70 to 74 years	163,125	179,847	16,722	10%
75 to 79 years	116,517	135,428	18,911	16%
80 to 84 years	76,123	86,111	9,988	13%
85 years and over	72,879	74,101	1,222	2%

Source: EMSI 2019.4

The largest increase to an Age Cohort group in percentage terms is 75 to 79 years, with an increase of 16%, the largest gain is 40-44 age group with an increase of 27,794.

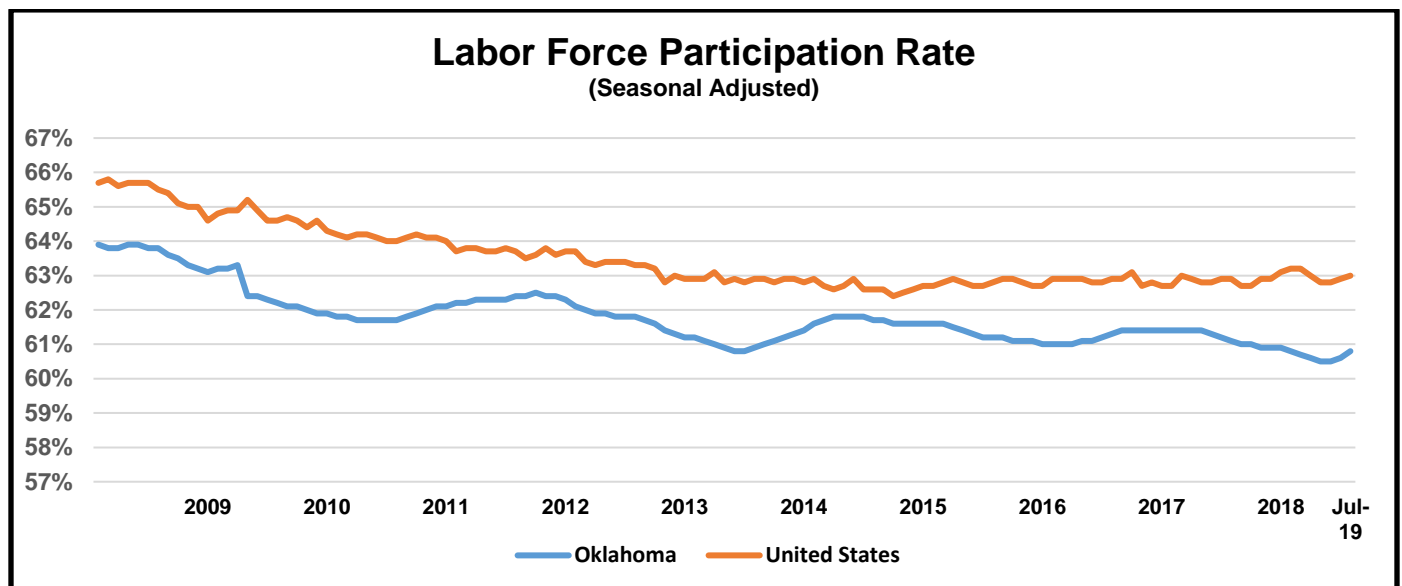
The second largest increase to an Age Cohort group in percentage terms is 80 to 84 years, with an increase of 13%, the second largest gain is to the 65-69 age group with an increase of 20,658.

The greatest lost to an Age Cohort in percentage terms was 55-59 age group with a lost -14%, there also lost the most in absolute terms.

## i. Employment and Unemployment

### Oklahoma Labor Force Participation

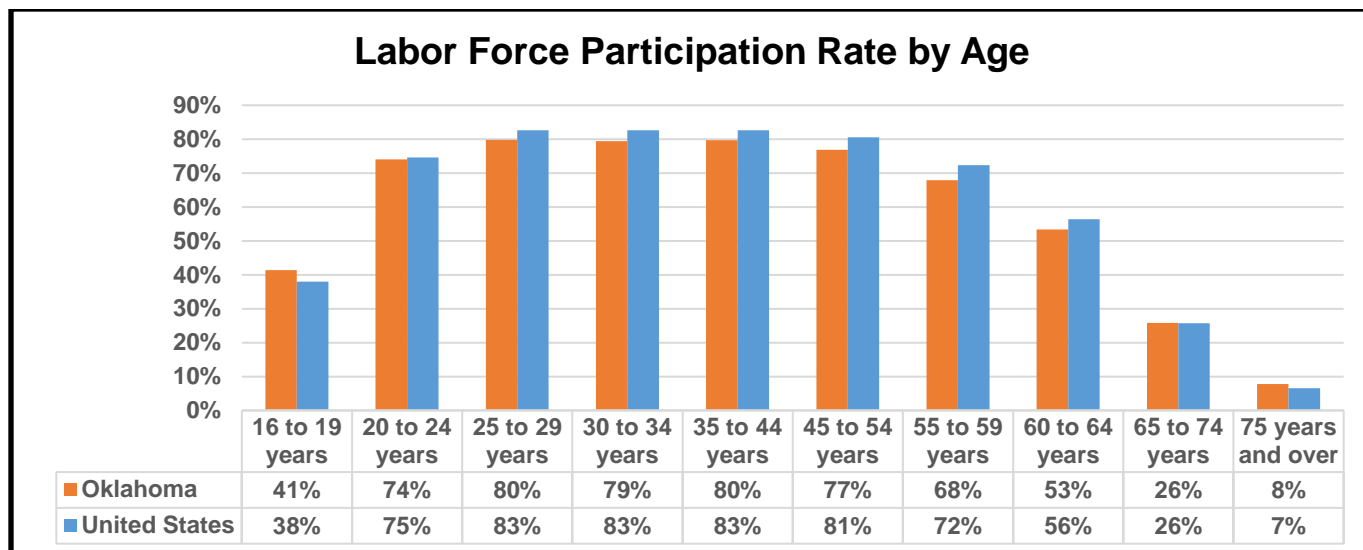
Labor force participation rate has experienced little change in the last four years.



Source: fred.stlouisfed.org

### Age

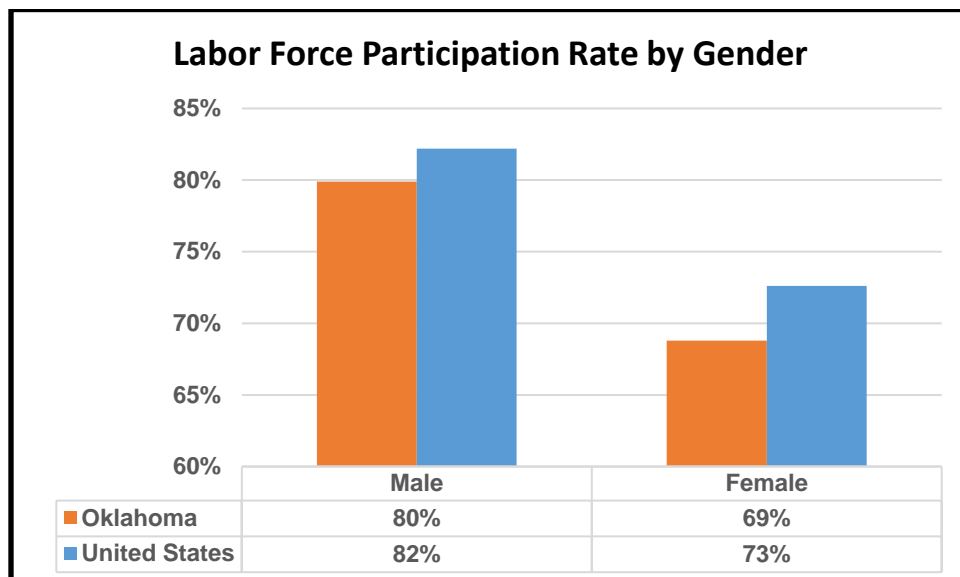
In the age groups for the traditional working age (16-64 years), the youth group had the lowest participation rate at 41% which is above the national rate of 38%. The group of with the highest labor force participation rate is 25 to 29 years and 35 to 44 years at 80% both with a higher national average of 83%.



Source: American Community Survey (ACS) 2018 5 – Year estimates

#### Gender

Males had higher labor force participate rate at 80% slightly lower than national average at 82%, and females had a participate rate of 69% compared to the national average of 73%

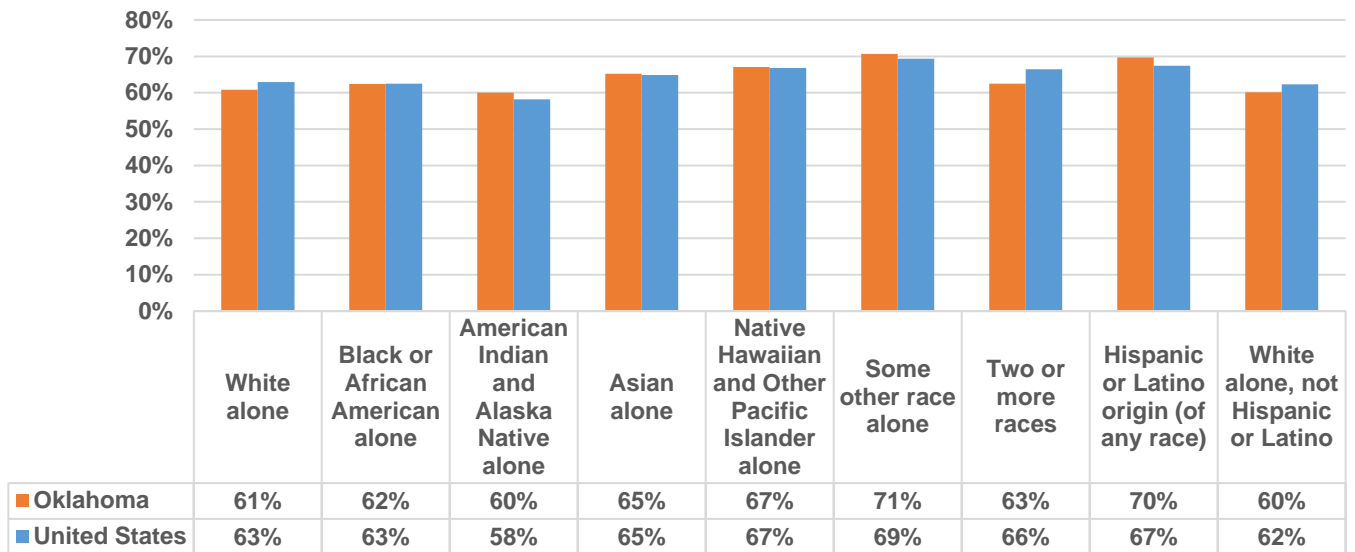


Source: American Community Survey (ACS) 2018 5 – Year estimates

#### Ethnicity

Some other race had the highest labor participation rate at 71% which higher than the national average of 69%. American Indian and Alaska Native and White had the lowest labor force participation at 60%, compared to the national average, American Indian and Alaska Native at 58% and White at 62%.

## Labor Force Participation Rate by Race/Ethnicity

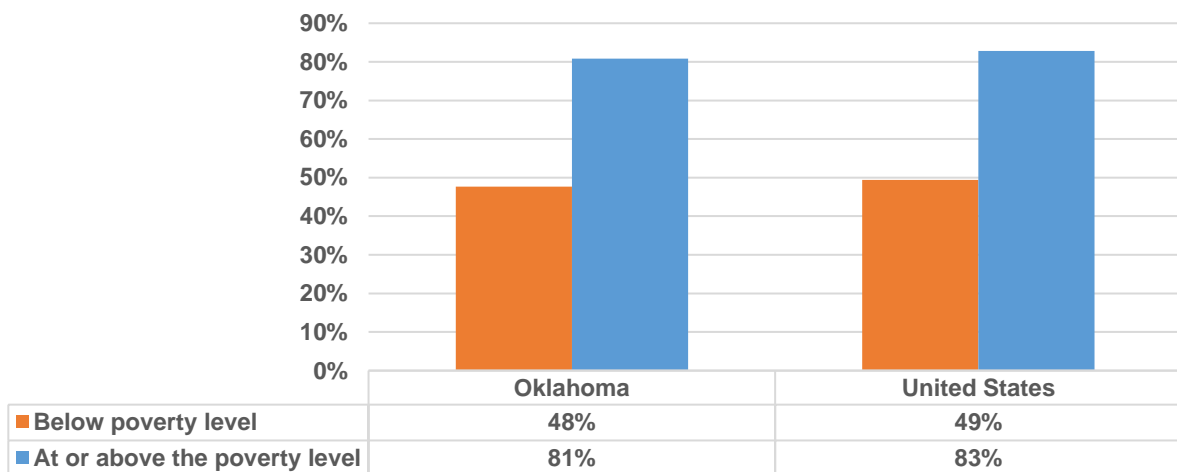


Source: American Community Survey (ACS) 2018 5 – Year estimates

### Poverty

48% of those below poverty participated in the labor force, compared to the national average of 49%. Those above or at the poverty level participated in the labor force at 81% compared to the national average of 83%

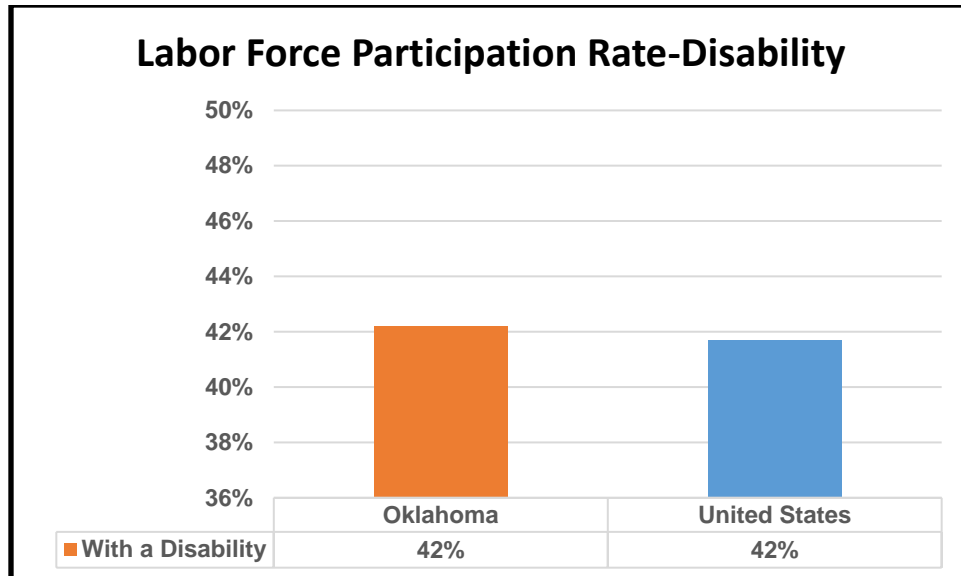
## Labor Force Participation Rate-Poverty



Source: American Community Survey (ACS) 2018 5 – Year estimates

### Disability

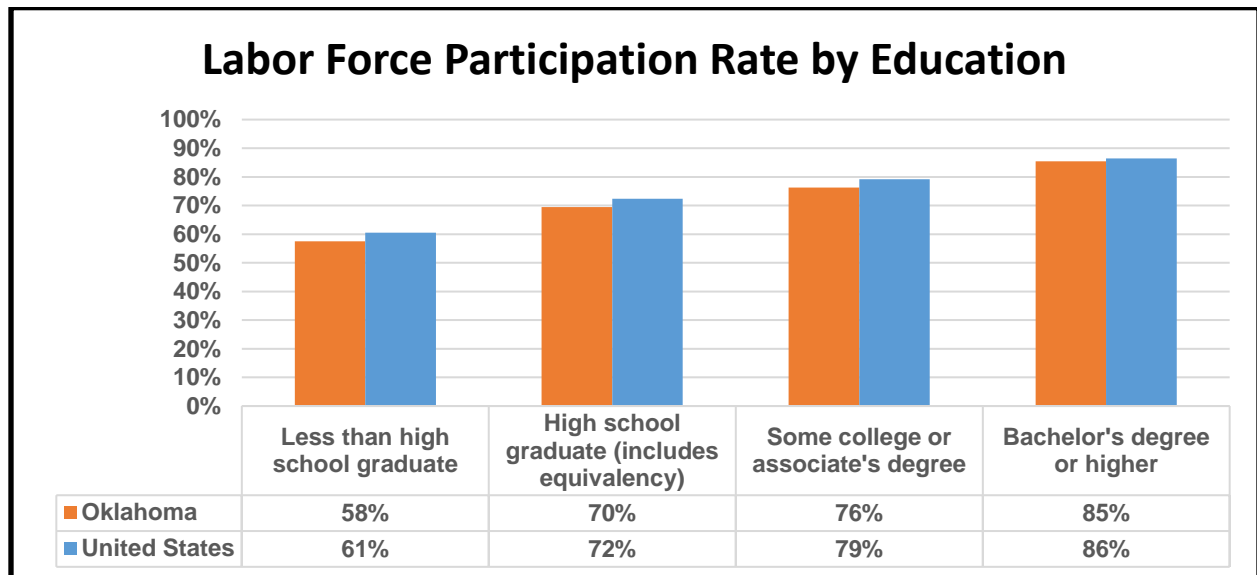
42% disabled individuals reported participating in the labor force.



Source: American Community Survey (ACS) 2018 5 – Year estimates

#### Education

Those individuals with highest labor force participation grouped by education was Bachelor's degrees or higher at 85%, with a national average of 86%. The lowest work force participation group in term of education was less than a high school degree with 58% and a national average of 61%.

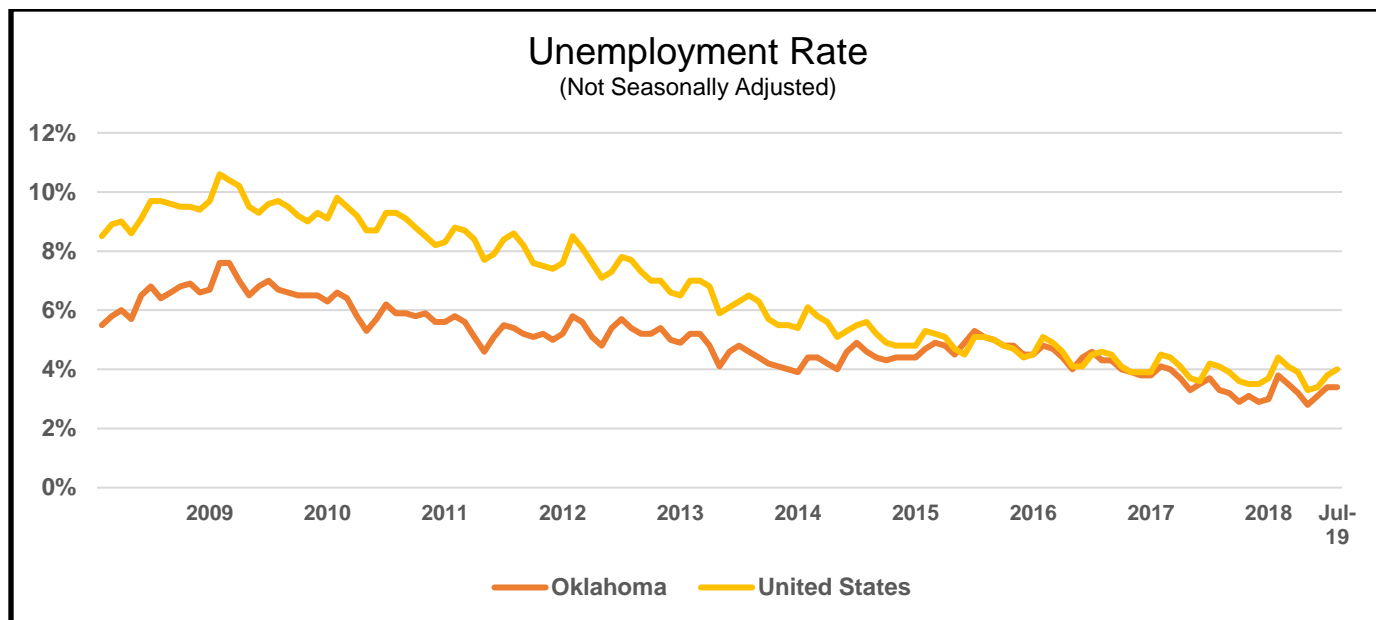


Source: American Community Survey (ACS) 2018 5 – Year estimates

#### Oklahoma Unemployment

Unemployment rate was 3.39% for 2018, decreasing 1% from 4.49% 4 years before.

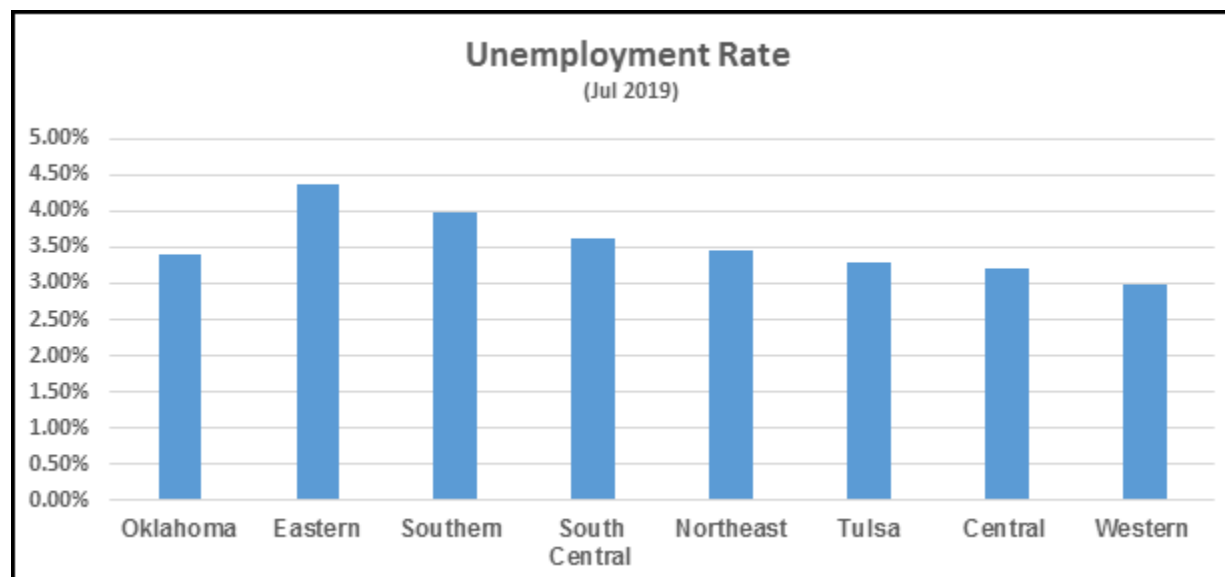




Source: fred.stlouisfed.org

#### Unemployment by Local Workforce Development Area

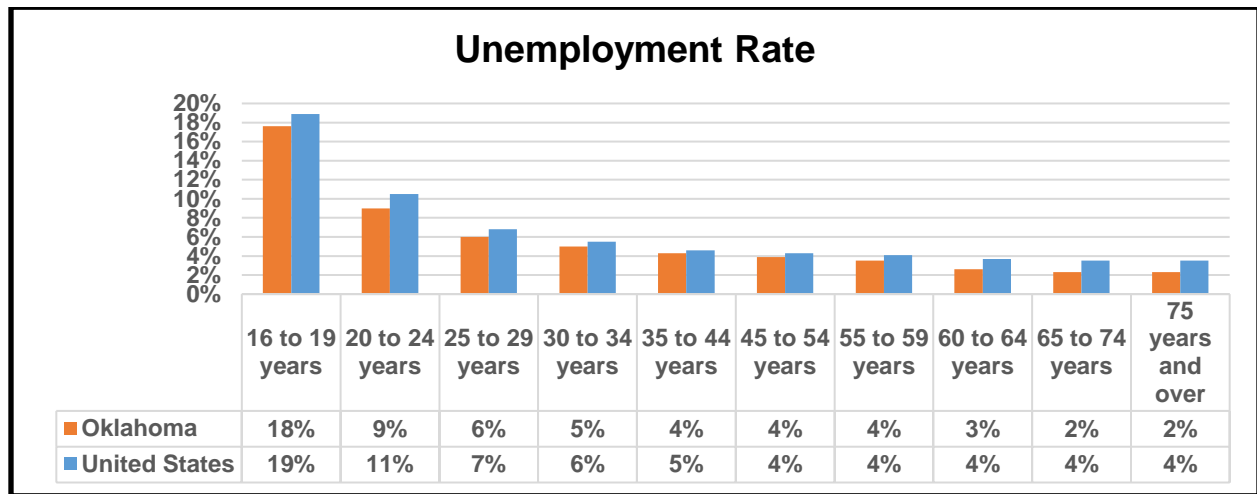
The highest level of unemployment can be found in the Eastern Region with an unemployment rate of 4.4% a percent higher than the State average of 3.4%. The second highest is the Southern Region with 4% unemployment. The lowest unemployment rate was found in Western Region with 3%.



Source: EMSI 2019.4

#### Oklahoma Employment by Age Group

In the age groups for the traditional working age (16-64 years), the youth group had the lowest unemployment rate at 3% which is above the national rate of 4%. The group of with the highest unemployment rate 16 to 19 years at 18% both with a higher national average of 19%.

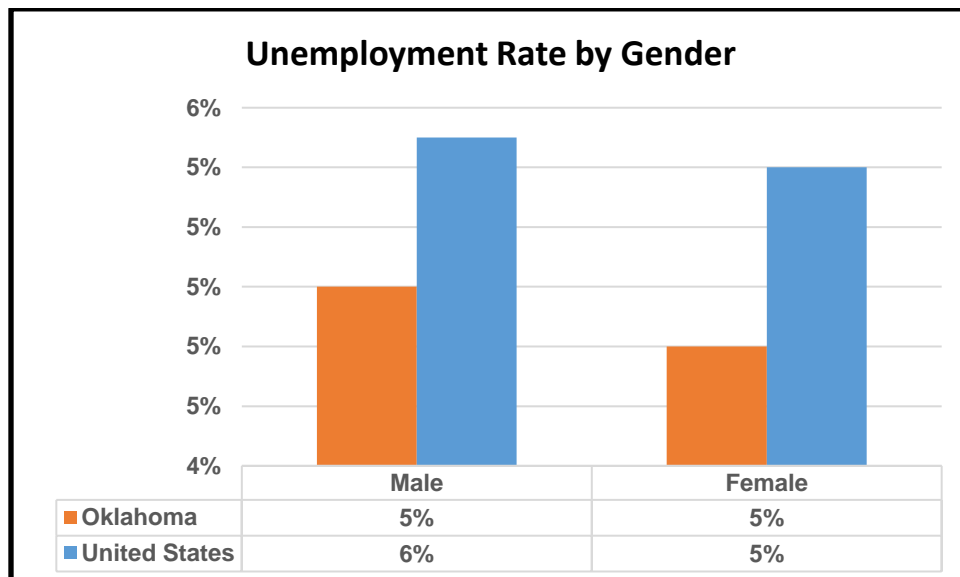


Source: American Community Survey (ACS) 2018 5 – Year estimates

## Employment and Unemployment Dynamics for Special Populations

### Gender

Males had an unemployment rate at 5% and a national average at 6%, and females had an unemployment rate of 5% which is the same for the national average.

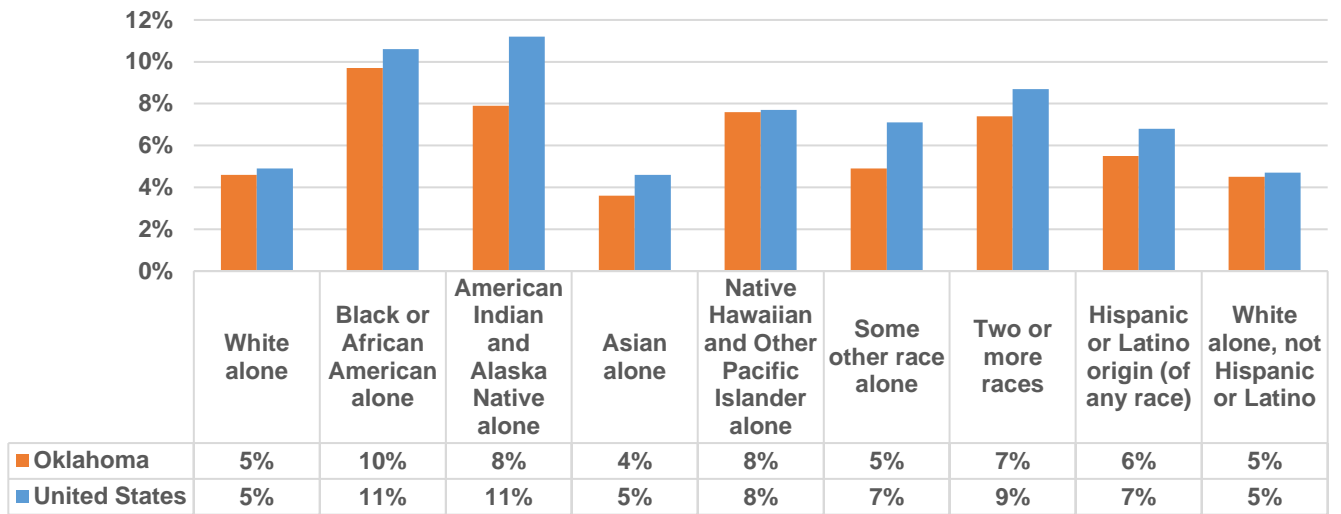


Source: American Community Survey (ACS) 2018 5 – Year estimates

### Ethnicity

Black or African American had the highest unemployment rate at 10% which higher than the national average of 11%. White alone White alone and not Hispanic or Latino had the lowest unemployment rate participation at 5%, compared to the national average 5% for both groups.

## Unemployment Rate by Race/Ethnicity

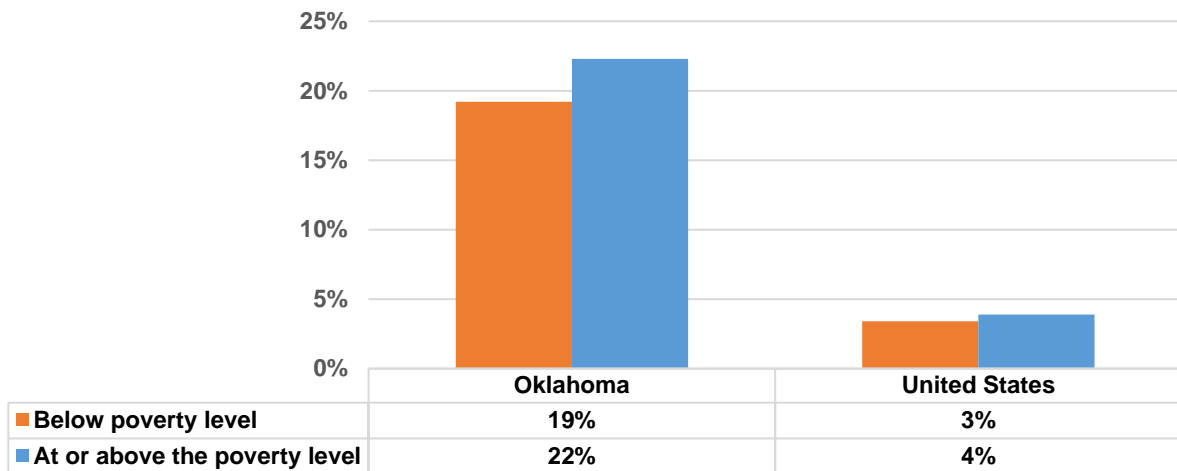


Source: American Community Survey (ACS) 2018 5 – Year estimates

### Poverty

19% of those below poverty are unemployment, compared to the national average of 22%.

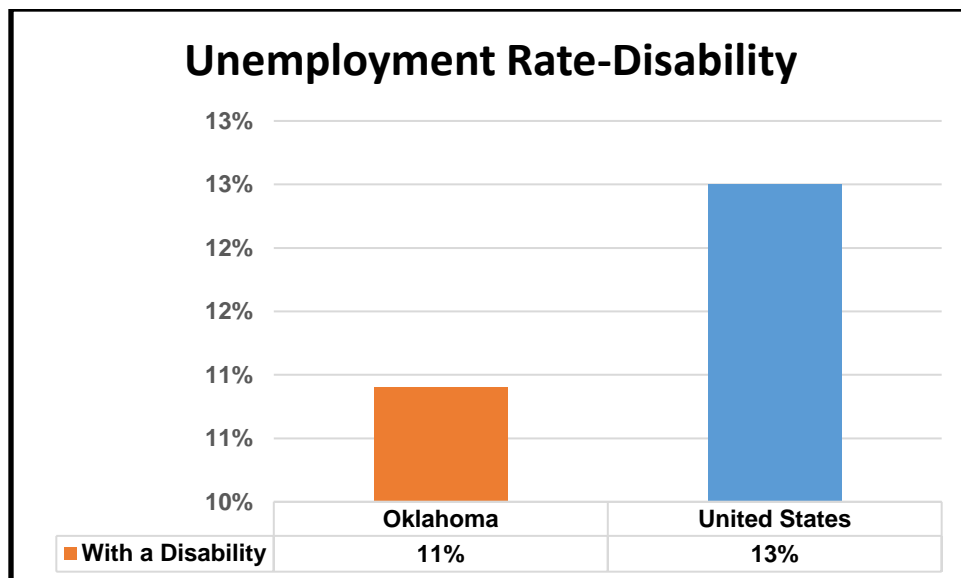
## Unemployment Rate-Poverty



Source: American Community Survey (ACS) 2018 5 – Year estimates

### Disability

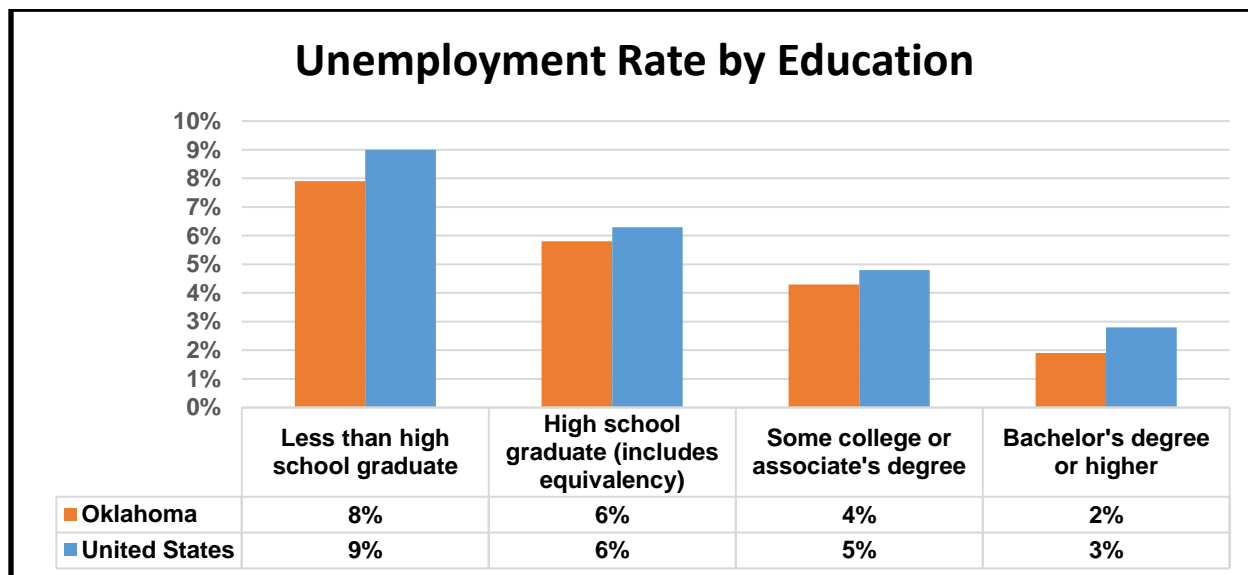
11% disabled individuals were unemployed compared to the national average 13%.



Source: American Community Survey (ACS) 2018 5 – Year estimates

#### Education

Those individuals with highest unemployment rate grouped by education was less than high school graduate at 8%, with a national average of 9%. The lowest unemployment in terms of education was Bachelor's degree or higher with 2% and a national average of 3%.

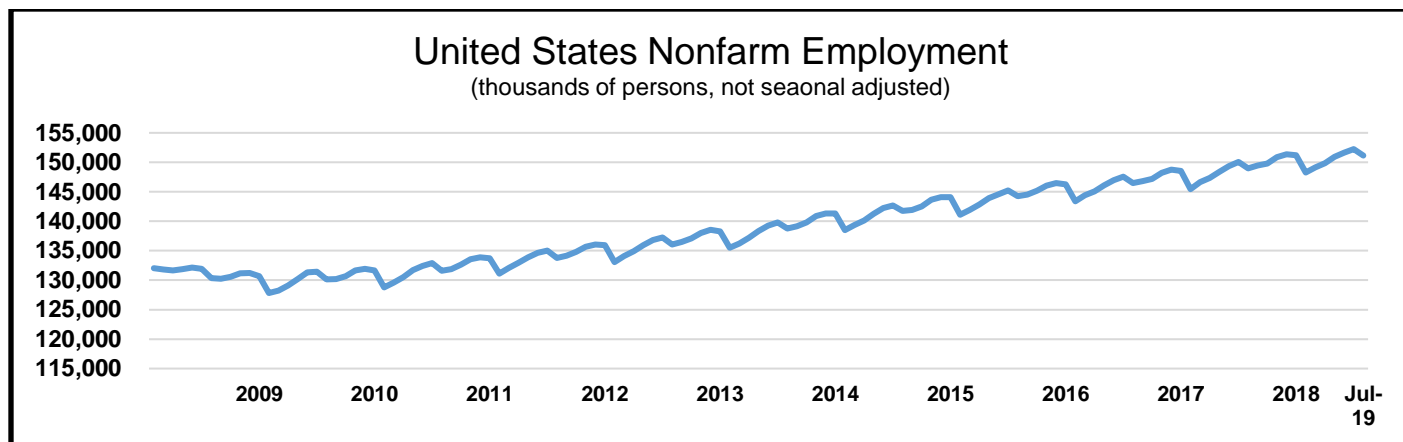


Source: American Community Survey (ACS) 2018 5 – Year estimates

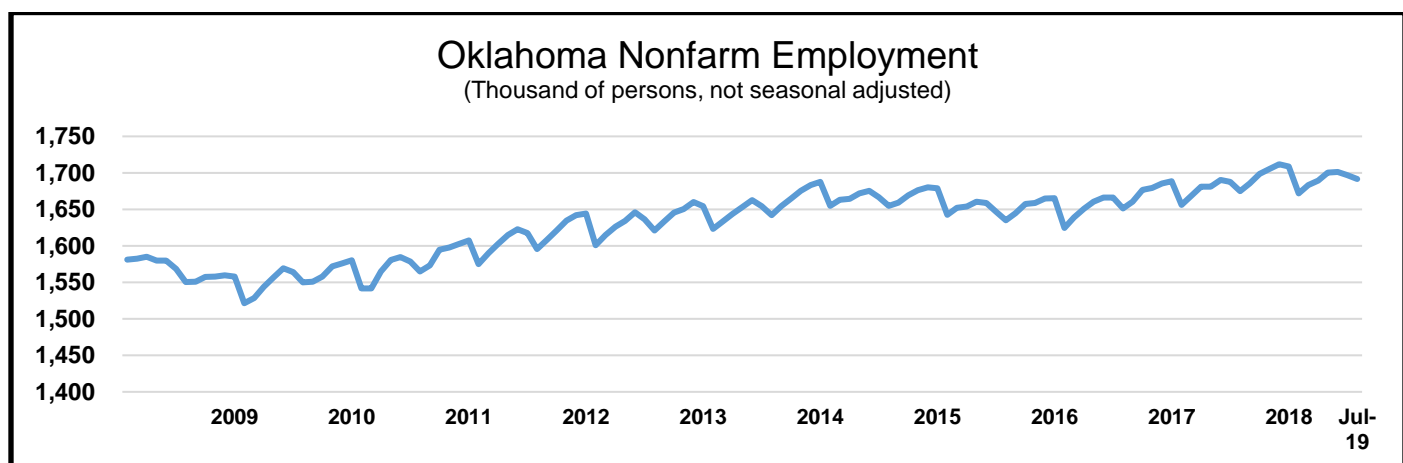
## ii. Labor Market Trends

### Industry Sector Employment

December 2018 had non-farm employment of 1,708,600. In 2018, Oklahoma's non-farm employment gained 52,500 (3%).



Source: fred.stlouisfed.org



Source: fred.stlouisfed.org

Highest employment was reported in the following sectors: Government, Health Care and Social Assistance, Retail Trade, and Accommodation and Food Services.

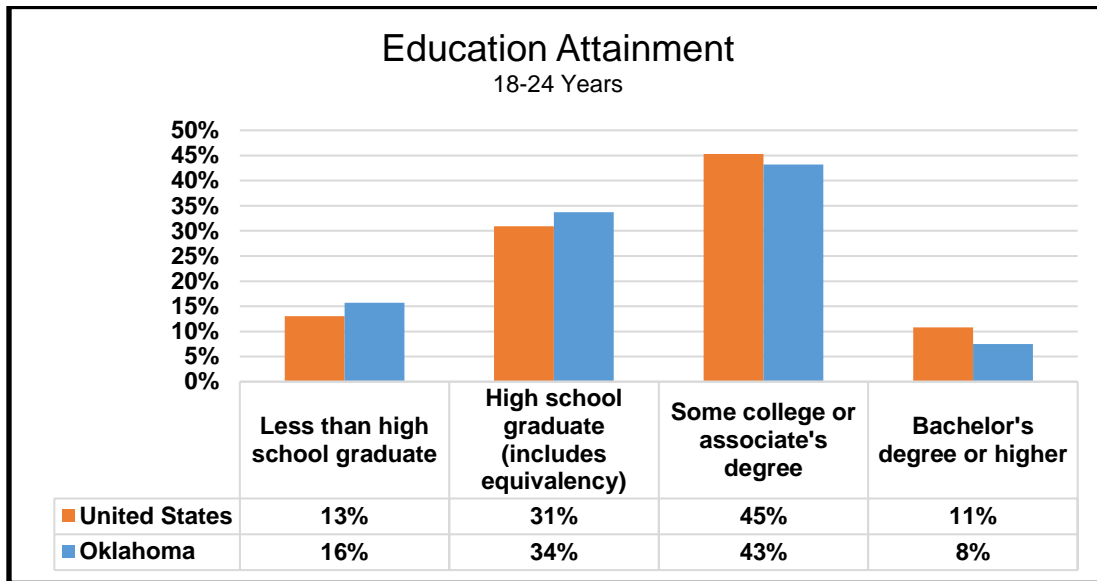
Occupation		Oklahoma	Oklahoma Avg. Earnings Per Job	United States	United States Earning Per Job
1	Government	362,498	\$62,088	24,564,335	\$77,728
2	Health Care and Social Assistance	202,969	\$55,991	20,860,311	\$60,809
3	Retail Trade	184,887	\$34,704	16,430,278	\$38,390
4	Accommodation and Food Services	156,762	\$19,418	14,109,961	\$25,124
5	Manufacturing	141,717	\$73,965	12,984,409	\$84,775
6	Administrative and Support and Waste Management and Remediation Services	110,375	\$41,925	10,227,437	\$46,889
7	Construction	109,018	\$56,835	9,245,288	\$67,364
8	Other Services (except Public Administration)	89,742	\$28,948	7,779,721	\$35,028
9	Professional, Scientific, and Technical Services	84,924	\$75,086	10,776,073	\$106,193
10	Finance and Insurance	62,782	\$76,310	6,581,239	\$125,346

Source: EMSI 2019.4

Government sector had 362,498 jobs and average earnings per job of \$62,088. Health Care and Social Assistance accounted for 202,969 jobs with average earnings of \$55,991.

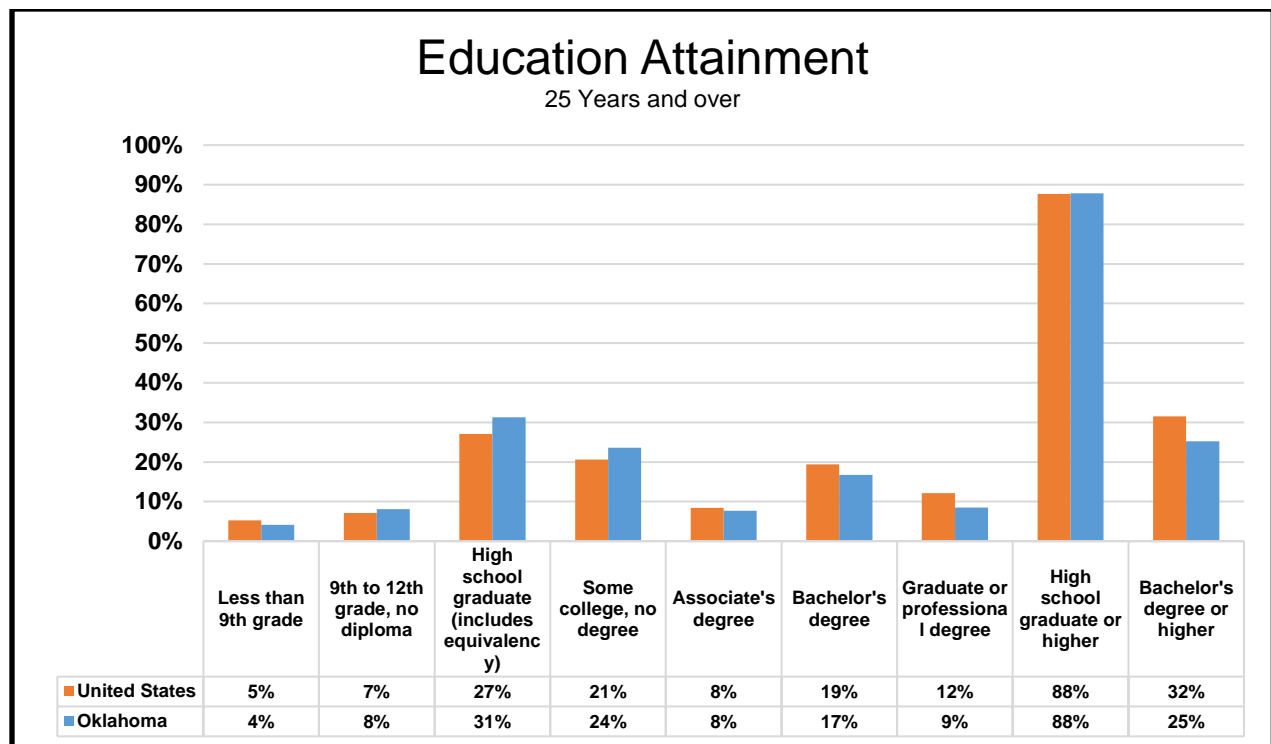
### iii. Education and Skill Levels of the Workforce

In the age group 18-24 years old the biggest education attainment group for Oklahoma is some college or an associate degree this is 43% of the population and with a United States average of 45%. The smallest group for this age group is bachelor degree or higher at 8% which is lower than the United States average of 11%.



Source: American Community Survey (ACS) 2018 5 – Year estimates

The age group 25 year or older the biggest education attainment group for Oklahoma is some college no degree this is 24% of the population and with a United States average of 21%. The smallest group for this age group is less than 9<sup>th</sup> grade at 4% and a United States average of 5%.



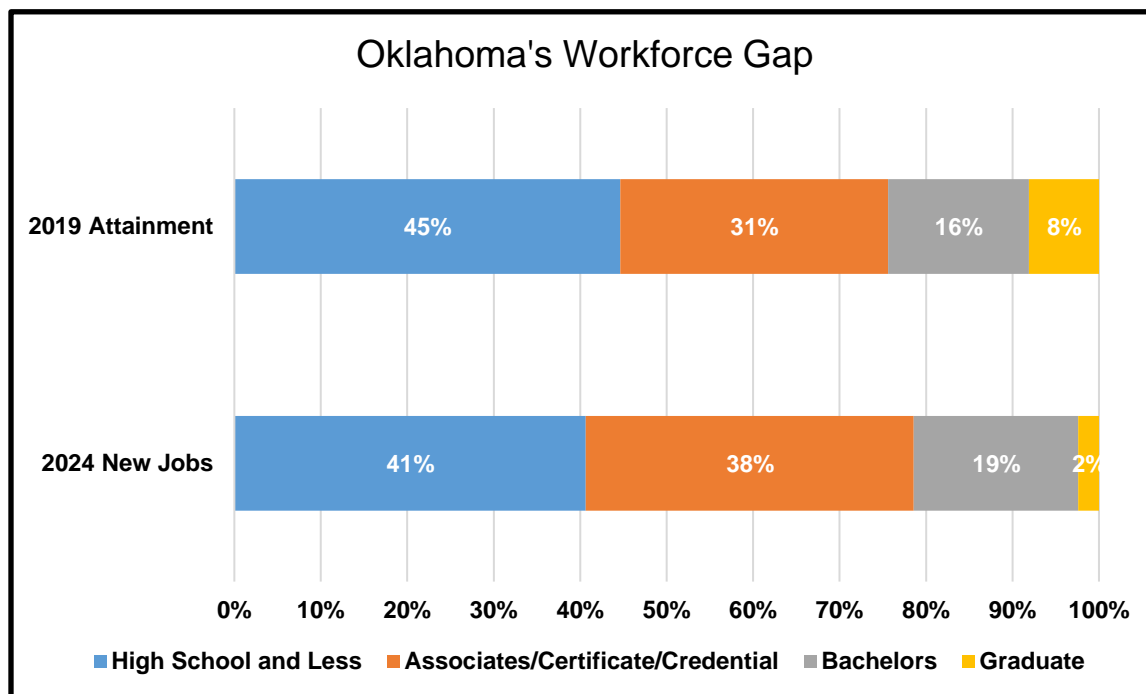
*Source: American Community Survey (ACS) 2018 5 – Year estimates*

#### IV. Skill Gaps

The forecast for the next 5 years for new jobs matched with level of education attainment in 2019 shows the gap at that level of education.

The greatest need or deficiency for workers educated at that level is found in Associates, Certificates, and Credential. The deficit is 7%, from the subtraction of 38% of new jobs in 2024, and the attainment level in 2019 of 31%.

The greatest surplus of an education level those with a Graduate degree. This surplus is 6%, from the subtraction of 2% of new jobs, and the 8% attainment in 2019.



Source: EMSI 2019.4

## 2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) *Education and Skill Levels of the Workforce* above, and the employment needs of employers, as identified in (a)(1)(A)(iii) *Employers' Employment Needs* above. This must include an analysis of –

### A. The State's Workforce Development Activities

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this



plan, and required<sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

The state continues to focus efforts on credential attainment as a top priority in order to address the education and skill needs of Oklahoma's employers and workforce. These efforts were coordinated under the Governor's broader workforce development initiative, Oklahoma Works, as well as through the implementation of the Workforce Innovation and Opportunity Act. During the previous WIOA State Plan years, Oklahoma spent time building stronger partnerships and coalitions, strengthening strategies, and building a strong state infrastructure on which to seek continuous improvement. Under the new Governor's administration, Oklahoma hopes to renew support for a state educational attainment goal and refocus efforts to achieve targeted improvements in the number of Oklahomans with postsecondary certificates and credentials of value.

Oklahoma identified Five Industry Clusters (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution) in an effort to align workforce development with state economic development priorities. Oklahoma also identified the 100 Critical Occupations (growth and demand occupations) within these ecosystems which allowed all Oklahoma Works efforts to be aligned to the most critical education and training needs. Since Oklahoma is continuing to move toward regionalism, the Department of Commerce also identified Industry Clusters at the regional/local levels to aid in strategic coordination efforts for Oklahoma's seven local workforce development areas.

The initiative's full array of workforce partners must align their efforts and take active roles in ensuring resources are used in ways that maximize, strengthen, and support the education to workforce pipeline for all Oklahomans.

## **B. The Strengths and Weaknesses of Workforce Development Activities**

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A) above.

### **Oklahoma Works System Strengths**

An updated SWOT analysis was completed by state workforce partners in late 2019.

Oklahoma's strengths include: strong interest from the Governor's administration, development of a state level workforce committee and plan, stronger private sector business member

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<sup>6</sup> Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

<sup>7</sup> Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

leadership on the Governor's Council, a strong postsecondary education system, and the creation of Centers of Workforce Excellence to strengthen the collaboration at the local level with alignment to local labor market needs.

1. In his first year as Governor, J. Kevin Stitt has taken a strong interest in workforce development as a way to boost economic development in the state. Under his leadership, the Cabinet Secretary for Commerce and Workforce Development convened a state level workforce committee that has developed workforce strategies primarily focused on the coordination of education partners and activities.
2. Also under Governor Stitt's leadership, more private sector business members have been added to the Governor's Council. These members were selected by the Governor and Cabinet Secretary with the expectation of active engagement and oversight of the state's workforce system.
3. Oklahoma boasts a robust and geographically diverse postsecondary education system with our Career and Technology Education System, and our higher education institutions, which includes our community colleges and four-year educational institutions. In particular, many local Career and Technology Education institutions have strong local ties to communities and are extremely responsive to local business' needs. As a part of the Governor's workforce plan, the state is developing Centers of Workforce Excellence that will be a designation for which postsecondary institutions can apply indicating they meet the criteria for excellence in workforce development training.
4. Finally, Oklahoma exhibits a strength in system-building and infrastructure development. Over the past several years, Oklahoma has developed internal processes, procedures and investments for creating a strong infrastructure. These have yielded a strong foundation on which to build future programs. The past two years, Core Partners have united on a customer-centered vision with a strong focus on businesses and job seekers. Advancements being made consistently focus on this vision. Also, processes and procedures across agencies with regard to data sharing for performance, access for targeted populations, accountability across partners for components of the workforce system, and coordination have been developed, and are continuing to be developed. Such a framework has established a strong foundation for future developments over the next two years of the State Plan.

## **Oklahoma Works System Weaknesses**

Oklahoma's Workforce Development Activities also have weaknesses that hinder us in realizing our State's vision for economic prosperity for all of our citizens, including: lack of workforce funding outside of WIOA, lack of communication regarding the Governor's workforce development committee and plan, efficient implementation of policies at the local level, and challenges of creating a longitudinal data system, information systems, and common intake processes and procedures and technology.

1. Oklahoma does not currently invest state dollars into the workforce development system which limits the activities that can be implemented through the workforce system's current capacity.
2. The Governor's workforce committee has had limited involvement from Title I and the State Workforce Board. This has created a lack of communication between the

Governor's plan and the strategies of the Governor's Council for Workforce and Economic Development. Also, Oklahoma runs the risk of limited capacity to deliver on the ambitious strategies set forth. Due to the state's revamped efforts in and leadership for workforce development activities, there are numerous workforce development initiatives, new and revived, across the state that are requiring engagement from partner staff and the business communities. Thus, partner staff are engaged in numerous workforce related efforts, running the risk of duplication of efforts and burn-out due to a lack of capacity to sustain the efforts with the current amount of staff available at each agency to devote to the efforts. Similarly, the business community may be exhausted in a short amount of time due to the numerous requests for engagement from a variety of partners and initiatives.

3. Although a major goal under Oklahoma Works is for a fully functional state longitudinal data system to better track the workforce development successes of the state and provide better data to inform policy and resource distribution, the State does not yet have a fully functional system. Further resources and continued commitment of Partners to implement this system is required in order for it to be successful.
4. The State's Education and Training Provider List (ETPL), Online Case Management System, and Labor Exchange System is not as functional nor fully dynamic as necessary to ensure a seamless system. The State must select a new vendor to ensure all new WIOA reporting requirements are met, the ETPL is fully functional to prevent barriers to identifying and securing education and training for participants, and the labor exchange system is accurate and practical for both job seekers and employers.
5. Oklahoma lacks a common intake or common registration system for citizens to better access programs for which they are eligible. All core partners have their own data systems and there is limited data sharing, which results in participant duplication, and tracking shared performance is difficult. Common intake is needed in order to get participants' the services they need, quicker, and more seamlessly, and get them education, training, and/or employment as efficiently as possible.
6. Finally, although partnerships are one of Oklahoma's biggest strengths, the interconnectedness of WIOA tests the breadth and depth of those partnerships on a daily basis. For example, despite efforts of state agency staff to meet and participate in convenings across state agencies at the state level, and with local area staff and leadership, communication across the state level and vertically to--and from-- the local level continues to be a challenge. Messaging of state level advancements and contributions to the system in the form of policies, processes, and infrastructure as required in the implementation of a new federal law, fail to provide tangible benefits to front-line staff providing services in the local area. Better communication and messaging between state agencies and between the state and local areas is necessary to appreciate each others' advancements and progress, and ensure each is responsive to the others' immediate and long-term needs.

Many of the weaknesses listed above require long-term vision and sustainable resources to improve. Though the state has implemented a new case management system for OESC and OOWD, challenges still exist as federal performance requirements continue to change. Similarly, vendor foci continue to be on adapting to constant federal performance changes requiring constant remapping of the system, and advancements to the ETPL part of the system have yet to be made. We anticipate those advancements to be made in 2020.

## **Oklahoma Works System Opportunities**

- Data integration through reporting portal
- More cross program policy development and local implementation to enrich collaboration and efficiencies
- Strengthening cross-sector partnerships by utilizing each entities strength instead of building stand alone processes
- Strengthening work-based learning alignment with local and virtual connectivity specific to meeting industry needs.

## **Oklahoma Works System Threats**

- Lack of support from local workforce board and system partners
- Difficulty getting business and industry actively engaged
- Misalignment of data elements and systems
- Siloed programs with limited communication between partners

## **C. State Workforce Development Capacity**

Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A) above.

Oklahoma has demonstrated the engagement in and capacity to deliver on the State's workforce development goals by leveraging state agency workforce partner agencies and staff, new leadership to move the State forward, and cooperation among core partners to better coordinate and deliver services. The state has enhanced, aligned, and expanded capacity to address the education and skill needs of the workforce under WIOA.

As mentioned in the Strengths and Weaknesses response, Oklahoma runs the risk of limited capacity, not because of a lack of commitment by Partner staff, but because of the increased urgency and significance of workforce development activities and initiatives in the state.

Within Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is composed of business leaders appointed to the Council who represent Oklahoma's diverse geography, who are from rural and urban areas, and who represent our state's major industry economic drivers. The Council has been tasked with using data to inform policy, track progress and measure success toward goals, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. The Governor's Cabinet and the GCWED have identified outcomes measures and targets to track progress over time. This dashboard facilitates the use of data to inform policy, track progress, and measure success consistently statewide. Recognizing that these are members of the business community and volunteers to the Council, these members meet quarterly to best make use of their time and travel from all regions of the state.

Similarly, GCWED underwent a structural revision in December 2019, making the Governor's workforce committee an ad hoc committee of GCWED to encourage better unification of the two efforts. The GCWED also plans to create an ad hoc committee focused on developing better

aligned technology and data systems across required one-stop partner programs with the goal of improving service delivery to individuals.

The System Oversight Subcommittee, the working arm of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development, is tasked with developing the system-wide framework and policy documents that will comply with WIOA legislation and Federal regulations, and are tasked with compliance review of the system (Oklahoma's 35 Workforce Centers located around the state). Staff from the following programs/agencies are represented on this committee: Career and Technology Education (Perkins and Adult Basic Education) through the Oklahoma Department of Career and Technology Education, Community Services Block Grant and Community Services Block Grant through the Oklahoma Department of Commerce, Senior Community Service Employment program and Temporary Assistance for Needy Families (TANF) through the Oklahoma Department of Human Services, Trade Adjustment Assistance programs and Unemployment Compensation programs through the Oklahoma Employment Security Commission, in addition to business, the Regents for Higher Education, and the Department of Rehabilitation Services, among others. The SOS includes and seeks input on policy and guidance from the Workforce Development Boards and staff as necessary. Staff, who are part of the System Oversight Subcommittee, represent some of the same partners as who attend the monthly workforce system partner meetings but are different staff.

In 2019, Oklahoma's Governor moved Workforce activities from the Education Cabinet Secretary back to the Secretary of Commerce and Workforce Development. By shifting workforce to the Commerce Secretary's portfolio, a renewed emphasis was placed on aligning workforce with economic development. The new structure and new leadership will bring a renewed commitment to workforce development.

Additionally, core partners are committed to better deliver and coordinate resources and services to maximize capacity among staff to better deliver services to jobseekers across the state. The core partners, as well as many required partners, along with the local Workforce Development Boards, will continue to develop a streamlined customer experience through referrals from and to core, non-core, and program partners to coordinate workforce activities and increase the capacity of each partner by allowing specialized services to function optimally and assist in the elimination of the duplication of services. For example, Local Elected Official Consortium Agreements identify collective responsibilities of the LEOs with regard to services provided, funding costs, methods for referring individuals among services, procedures to ensure customers with barriers to employment have access to services, and ensuring the system is meeting the needs of business.

Despite other potential threats to success, including the complexity and isolation of the state's data systems, the culture shift required for systems thinking as opposed to programs thinking under WIOA, and the culture shift required by today's global economy for skills--and the workforce-- to be flexible, adaptable, and stackable, opportunities exist to utilize the capacity in place, or to enhance capacity, for the sake of our talent pipeline. Optimizing capacity to focus on opportunities, system-building and cross-training to support systems thinking and customer-centered, or human-centered design of the workforce development system, will allow the system to adapt to changing resources in the form of funds and/or human capital.

## **b. State Strategic Vision and Goals**

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include -

### **1. Vision**

Describe the State's strategic vision for its workforce development system.

The State's strategic vision: Align resources, education, training and job opportunities to build Oklahoma's workforce.

Oklahoma Works works toward this vision by providing education and training for citizens to obtain quality employment through the scope of the federal Workforce Innovation and Opportunity Act (WIOA). The State Workforce Board also strives to coordinate strategic priorities and plans across education, training, and industry to provide employment opportunities for workers and ready availability of highly skilled talent for business and industry.

Within Oklahoma, the Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is composed of a majority of business leaders appointed to the Council who represent Oklahoma's diverse geography, who are from rural and urban areas, and who represent our state's major industry clusters. The Council has been tasked with using data to inform policy, track progress and measure success toward implementing WIOA, and governs, manages, and accounts for the way the state issues Department of Labor WIOA monies. The Governor's Cabinet and the GCWED have developed metrics for workforce development in Oklahoma. These metrics, including benchmarks and targets, will be made into a data dashboard that will be used to inform policy, track progress, and measure success consistently statewide.

Under the leadership of the Governor and the GCWED, Oklahoma Works has established the foundational pieces that align all initiative and WIOA efforts at the state and local levels. These include:

**State and Regional Industry Clusters:** Through a comprehensive quantitative analysis, Oklahoma identified five State Industry Clusters that help drive wealth generation in the state (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution). Additionally, Oklahoma identified Regional Clusters that will help drive wealth generation in each region and align efforts to economic development priorities.

**100 Critical Occupations:** These occupations represent the most pressing needs in each of Oklahoma's State Industry Clusters necessary for the state's continued growth and economic prosperity. Updated annually, this list of jobs represents demand and growth occupations in a variety of industries, requiring varying levels of education and training, and spanning all levels of hourly earnings.

**Earn and Learn Oklahoma:** Established in November 2017 through Executive Order, Earn and Learn Oklahoma, which created a statewide goal to increase the number of quality work-based learning opportunities per year to 20,000 by 2020. The goal of this initiative is to ensure more

Oklahomans have access to Registered Apprenticeships and quality work-based learning opportunities like on-the-job training, work experience, job shadowing, and internship.

## 2. Goals

Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include-

**A. Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>**

**B. Goals for meeting the skilled workforce needs of employers.**

The Governor's Council convened a strategic planning process in April 2019, which included input from the Core Partners (Oklahoma Department of Rehabilitation Services, the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and Office of Workforce Development), business and industry members, Local Workforce Development Board members and elected officials, and other state agency partners who are a part of the state's workforce development system (education, commerce, health, veterans, human services). The resulting strategic plan was adopted in September 2019 and serves as the overarching workforce development strategy for WIOA.

Included in the plan are four objectives and multiple strategies, including:

Objective/Goal 1: EXPAND OKLAHOMA'S WORKFORCE TO SATISFY INDUSTRY AND ECONOMIC DEVELOPMENT GOALS: An expanded workforce will provide a larger pool of potential workers, increase the financial and economic opportunities of workers, and encourage greater business investment, economic development, and job creation. Strategies include:

- Engage and upskill Oklahoma's current and potential workers
- Retain Oklahoma's workers
- Increase the state's Labor Force Participation Rate

Objective/Goal 2: UPSKILL OKLAHOMA'S WORKFORCE: A well-trained workforce will reduce the incidence and effects of unemployment, increase the financial and economic opportunities of workers, and encourage greater business investment and job creation. Strategies include:

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<sup>8</sup> Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

<sup>9</sup> Veterans, unemployed workers, and youth and any other populations identified by the State.

- Strengthen public education's focus on career readiness outcomes
- Expand work-based learning opportunities including Registered Apprenticeships
- Decrease the percent of Oklahomans without a High School Equivalency credential
- Increase the percent of Oklahomans with a post-secondary credential or degree

Objective/Goal 3: OFFER WORKFORCE SOLUTIONS TO OKLAHOMA'S BUSINESSES: Businesses that have access to a responsive, effective and solutions-focused public workforce system will be better positioned to expand the availability of quality jobs and capital investments. Strategies include:

- Increase understanding of workforce services among businesses through focused educational and marketing strategies
- Engage businesses in program design and service delivery
- Develop and provide more responsive recruiting tools

Objective/Goal 4: BUILD OKLAHOMA'S WORKFORCE SYSTEM CAPACITY: A public workforce system able to respond to changing business needs and deliver innovative solutions will support the expansion of business investments and job creation:

- Drive innovation in program development and service delivery
- Diversify funding in support of workforce development
- Expand data assets, alignment and use
- Establish a unified State information baseline for data integrity

Job seeker goals include a focus on specific populations, including for youth and adults.

Goals for Youth:

- A greater focus and clearer strategies for out-of-school youth (14-18 years) with regard to credential attainment, work experience, and work-based learning;
- An increased awareness of jobs that are currently available and lead to economic success, as demonstrated by labor market information.
- An increased awareness of and access to other options/paths, in addition to college, such as Registered Apprenticeships;
- And, a fully deployed Individual Career and Academic Plan (ICAP) integrated with all students within the secondary school system as a preventative measure.

Goals for Individuals with Barriers to Employment:

- Clearer strategies for ex-offenders, including the exploration of a pay for performance strategy, as ex-offenders represent a large population of Oklahoma's workforce;
- Connecting more WIOA participants to Registered Apprenticeship opportunities;
- Increased on-the-job training opportunities (e.g., registered apprenticeships, internships, etc.) to ensure the integration of relevance with education and training, as well as enculturation into appropriate professional and soft skills;
- Greater assistance for those who experience a job loss and are supporting a family (e.g., re-training);



- An increased focus on lifelong learning through development of a state-level strategy to ensure individuals are both successful in the current job market, as well as the future economy as skills are increasingly changing as technology develops; and
- Supporting and guiding a shift from survival mode to a vision for the future (adult and youth; consider mentors) for those hard-to-serve and opportunity populations.

### **3. Performance Goals**

Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

Performance measurements are negotiated annually with the US Departments of Labor and Education. Oklahoma will develop proposed targets for the applicable performance measurements for PY 20 and PY 21. This state plan will be updated as performance targets are negotiated in each program year based on the negotiation process with the federal departments.

### **4. Assessment**

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

The State will measure the overall effectiveness of the system as follows:

- The WIOA performance measures applicable to the WIOA Core Partners include measures for education, credentials and progress in education for both youth and adults. As the state collects the information quarterly, Oklahoma Works will be able to assess the progress of the partners in meeting the State's vision and goals.
- The Governor's Council, including WIOA Core Partners, will establish an annual review of Cabinet and State Workforce Board performance metrics.
- Biennial certification of local workforce boards will assure that the boards are fully appointed and include individuals with optimum policy making authority and expertise providing appropriate oversight and policy guidance to the local system.
- Annual program and fiscal reviews of the seven local boards.
- Monitor expenditure levels of the local areas and the core partners to assure services are flowing to participants.
- Monitor the level of workforce-related complaints which reach state level review.
- Certification of local one-stop centers as required by WIOA.
- Assure the local one-stops are accessible and accommodate individuals with disabilities by monitoring attainment of newly created STAR Accessibility Certification.
- Requiring that Eligible Training Providers provide assurances through their applications for inclusion in the State List of Eligible Training Providers that their facilities are accessible and that reasonable accommodations are made for students as needed.

- Assure continuous improvement strategies are identified through ongoing research and evaluation and implemented at the state and local levels.

The local boards and state partners are very familiar with continuous improvement principles. Results of assessments both positive and negative will be communicated to the local boards and partners. As appropriate, corrective action including plans for improvement will be requested in accordance with continuous improvement principles and evaluated for their likelihood of success. Where performance, programmatic, or fiscal integrity is of concern, the State will communicate directly with the local board chair and the chief elected official.

## **c. State Strategy**

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

**1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7) and includes registered apprenticeship. “In-demand industry sector or occupation” is defined at WIOA section 3(23).**

### **Oklahoma’s Career Pathways Initiative**

Oklahoma continues to have an active statewide Career Pathways initiative with the goal of having a comprehensive system in place that leads students and out-of-school youth, dislocated workers, and incumbent workers through a full range of career exploration/counseling and education and training opportunities that correspond to employer needs, thus assuring a pipeline of appropriately skilled and credentialed workers for Oklahoma’s companies.

Under the leadership of the Governor’s Council for Workforce and Economic Development, the state has aligned policies and definitions to match those as outlined in WIOA and correspond to the state’s in demand industries and occupations. Additionally, the Governor’s Council plays a key role in establishing the state vision for workforce and economic development integration. In support of career pathways, the Governor’s Council has a Career Pathways Committee that is focusing on the workforce needs of Oklahoma employers, ensuring education providers can meet those needs, and increasing the skills of Oklahoma workers in order to close the skills gap. Solutions to these challenges are in sector strategies, career pathways, attainment of

credentials/degrees, and increasing the number of Oklahomans with a High School Equivalency certificate.

To accomplish WIOA strategies, Oklahoma Works collaborates with public and private partners to build and strengthen career pathways to meet the needs of state and regional employers. To increase career exposure and exploration, expand work experience along career pathways, and promote education and training that lead to high demand occupations and industries, Oklahoma is focused on several strategies:

### **1. Expansion of Oklahoma Career Exposure Week:**

Career Exposure Week began in 2017 as a way to connect local students with area businesses to give future talent the opportunity to explore the possibilities in Oklahoma that await them. Last year nearly 50 events were registered on the [oklahomaworks.gov](http://oklahomaworks.gov) website that allowed local businesses and employers to showcase critical careers in demand industries, to inspire and recruit new talent, and gave all levels of the talent pipeline a front row seat to experience the wide array of careers available within our State. Sponsored events range from hosting on-site job shadow experiences, industry tours, classroom presentations or other activities targeted to students in K-12 and beyond. Oklahoma Career Exposure Week was created to:

- Introduce people to careers in businesses and industries in Oklahoma's Driver and Complementary ecosystems and Critical Occupations;
- Empower Oklahoma businesses and industries in the state's ecosystems and KEN regions to engage with educators, students, parents, and others about career opportunities;
- Change misconceptions of Oklahoma's demand and critical occupations and the businesses and industries in Oklahoma's driver and complementary ecosystems;
- Draw attention to the roles businesses and industries play in communities across the state; and
- Underscore the economic and social significance of demand and critical occupations and businesses and industries in Oklahoma's ecosystems.
- Oklahoma will work with partners to expand Career Exposure Week in the coming years to continue preparing youth and individuals with barriers to employment for the workforce.

### **2. Support the expansion of Oklahoma Education and Industry Partnership (OEIP):**

OEIP offers professional development opportunities for Oklahoma fifth- through 12th-grade teachers each summer. The program allows Oklahoma educators to tour local businesses, hear from professionals in various industries, and attend education workshops to help incorporate newly acquired knowledge into curriculum. This allows more students exposure to demand industries and occupations by equipping educators with the knowledge needed to promote career pathways and the education and training opportunities available to students interested in high growth and demand occupations.

### **3. Increasing awareness of Career Ladders aligned to Critical Occupations**

In 2019, Oklahoma Works released Career Ladders aligned to each of the state's Critical Occupations (high growth, high demand) that also highlight transferrable skills between industries and occupations. Over the next four years, Oklahoma would like to increase awareness of these pathways and expand the reach of this information as a way to promote demand career pathways in Oklahoma.

### **4. Support Individual Career and Academic Plans (ICAP)**

The Individual Career and Academic Plan (ICAP) was recently developed for the state's PK- 12 system by the Oklahoma State Department of Education (OSDE) with input from students, families, educators and other partners. The ICAP equips students with the awareness, knowledge and skills to create their own individualized, meaningful exploration of college and career opportunities. In order to reflect students' changing passions, aptitudes, interests and growth, the ICAP is a flexible, evolving document. The ICAP incorporates labor market data into occupational exploration materials to allow students to make informed decisions about education and training for future career goals.

### **5. Expansion of Work-Based Learning**

Oklahoma Works has prioritized diversifying and expanding work-based learning opportunities as a vital component of strengthening career pathways, increasing statewide educational and training attainment, and closing the skills gap. To do this, Oklahoma Works partner agencies are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies like Registered Apprenticeships and job shadowing. In November 2017, a statewide goal was established through Executive Order to increase the number of Registered Apprenticeships and other work-based learning opportunities in the state to 20,000 by the year 2020.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a State Apprenticeship Expansion (SAE) Grant from the U.S. Department of Labor in 2019 to expand and diversify apprenticeship opportunities in Oklahoma. As a part of that grant, Oklahoma is working to:

- Expand the capacity of the OOWD and its partners to develop and register new apprenticeship programs.
- Develop apprenticeship outreach and communications plans to increase public awareness and conduct engagement activities with industry partners.
- Ensure more WIOA participants have access to Registered Apprenticeship opportunities.

The main strategy of Oklahoma's SAE Grant is to focus on creating and expanding RA opportunities within targeted industries, including: Finance, Public Service/Government, Retail, Child Care, Food Service, Public Utilities, Alternative Energy, Aerospace, and Health Care.

Strategies for expansion and diversification also include outreach to specific underserved populations such as women, individuals with disabilities, formerly incarcerated

individuals, minorities, veterans, and out of school youth. OOWD staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations.

The State is committed to fully integrating RA programs as an employment and training solution for one-stop centers. Local areas will have maximum flexibility in serving participants and supporting their placement into RA programs. There are several ways in which training services may be used in conjunction with these RA programs, including developing an Individual Training Account (ITA) for a participant to receive RA training, utilizing an On-The-Job Training (OJT) contract with an RA program for providing both classroom and on-the-job instruction; a combination of an ITA to cover the classroom instruction along with an OJT contract to cover on-the-job portions of the RA; and utilizing incumbent worker training for upskilling apprentices who already have an established working/training relationship with the RA program.

## **Career Pathways and Adults and Dislocated Workers**

The Oklahoma Works' strategic plan recognizes that career counseling and training services are critical to the employment success of many adults and dislocated workers, including unemployed and underemployed individuals. Oklahoma continues to develop strategies to support the use of career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce development activities, education, and supportive services to enter or retain employment.

Also in alignment with the goals of Oklahoma Works, local boards continue to utilize Title I Youth, Adult and Dislocated Worker funds in partnership with other entities that provide workforce services, adult and basic education, and rehabilitation services. Together these partner entities expand the access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. This facilitates the development of career pathways and co-enrollment into core programs, and improves access to activities leading to recognized postsecondary credentials, including industry-recognized certificates and certificates that are portable and stackable.

## **Oklahoma's Sector Partnerships Initiative**

The Oklahoma Office of Workforce Development (OOWD) supports the development and growth of sector partnerships in the local Workforce Development Areas by providing funding opportunities for local areas, regional planning areas, and intermediary partners to establish, strengthen, and expand sector partnerships and identify partnerships for career pathways development. Goals for this work, include:

- Prioritize support and resources for demand industries and career paths.

- Provide technical assistance to partners working to develop and implement sector partnerships and strategies for increasing credential attainment.
- Align regional strategies to statewide goals and initiatives, including strategies for developing and strengthening career pathways and expanding and diversifying opportunities for Registered Apprenticeship.
- Promote credentials of value, growth and demand occupations, critical occupations in Oklahoma's Industry Clusters, and industry-driven solutions for closing the state's skills gaps.
- Develop and implement local and regional strategies to assist Oklahomans in entering critical occupations and closing skills gaps. Targeted populations include WIOA-defined special populations, including ex-offenders, veterans, homeless adults, long-term unemployed, individuals with disabilities and at-risk youth.
- Blend and leverage resources and funding to support the long-term sustainability of sector partnerships and strategies for increasing credential attainment.

The Career Pathways Committee of the Governor's Council for Workforce and Economic Development serves in a leadership role for this work, helping to identify and coordinate training, technical assistance, and other resources necessary to support sector partnerships at the local and regional levels. Additionally, the Committee created a subcommittee for employer engagement and industry partnerships which is responsible for identifying state-level opportunities for industry and sector partnerships. The results of sector partnership work are intended to inform and guide the work of the Career Pathways Committee.

## **Business Services**

The Oklahoma Office of Workforce Development (OOWD), which administers WIOA title I, is revamping business services. In addition to providing additional resources to local areas to hire full-time board staff dedicated to business services activities, required core services are being established to ensure consistency in services regardless of where a business is located in the state. Data-informed business services strategies include:

- Sector Strategies:
- Incumbent Worker Training:
- Competency-Based Hiring Strategies:
- Registered Apprenticeship:
- Layoff Aversion Strategies:
- Real-Time LMI Data Reports:

**2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).**

Central to WIOA is the integration of service delivery among multiple workforce development programs. Oklahoma Works' Strategic priorities are coordinated by the Governor's Council for Workforce and Economic Development (GCWED). The GCWED believes that coordinating strategic priorities and plans at state and local levels across education, training, economic development, and business and industry will provide employment opportunities for workers and ready availability of highly skilled talent for business and industry. Oklahoma has strong partnerships among state agencies, education institutions (PK-12, career and technical education, 2- and 4- year institutions), economic development organizations, and community-based organizations, both at the State level and at the local level with our Workforce Development Boards.

Strategies for workforce system service delivery alignment are framed under the objectives set forth in the strategic plan of the Governor's Council for Workforce and Economic Development (GCWED) to expand Oklahoma's workforce to satisfy industry and economic development goals, upskill Oklahoma's workforce, offer workforce solutions to Oklahoma's businesses, and build Oklahoma's workforce system capacity.

Strategies that support and promote the alignment of workforce system partners include regularly convening partner meetings at the state level through Core Partner meetings and the work of the System Oversight Subcommittee under the guidance of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development (GCWED). The System Oversight Subcommittee (SOS) is comprised in membership of state level partner leadership for the purposes of system evaluation, improvement, and policy development. The subcommittee works through a task force model to include the input of subject matter experts and local area perspectives. Partners are also convened regularly through local One-Stop Operator partner meetings, focus groups, task forces, etc. Coordination across agencies and programs prevents "siloing" and duplication. As duplicative efforts are discovered through continued partnership and communication, agencies and programs will identify more opportunities to align.

Through the annual Oklahoma Works Partner's Conference, workforce partner organizations at the state and local levels coordinate and convene for professional development. The annual Oklahoma Works Alumni Celebration is another event produced through the collaboration and coordination with all workforce partners in recognition of participation of the workforce system and business leaders from all workforce areas in the state of Oklahoma. The Alumni Celebration embodies successful system partnership in action, as a requirement for nomination is that a job seeker has been assisted by more than one system partner to achieve recognition. Business leaders are also awarded on behalf of the Governor for each of the workforce areas.

Additionally, under the direction of the Governor and the Governor's Council for Workforce and Economic Development, priorities were established for local workforce development boards to direct more funds to training and education services. The goal was set for local boards to direct 40 percent of their formula-allocated Adult and Dislocated Worker funds each program year on allowable training costs, that lead to a recognized postsecondary education and/or workforce credentials directly linked to an in-demand industry or occupation. This requirement is part of an

ongoing effort to address the skills gap and ensure services consistent with the GCWED's goals. Partner programs and services will need to be leveraged to offset many supportive services and other associated costs, to allow for these increased training expenditures.

### **III. Operational Planning Elements**

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include -

#### **A. State Strategy Implementation**

The Unified or Combined State Plan must include -

##### **1. State Board Functions**

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e. provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The Governor's Council for Workforce and Economic Development (GCWED, Governor's Council) is playing a key role as the vehicle to establish the state vision for workforce and economic development integration. Integration of workforce and economic development objectives will result in a competitive advantage for Oklahoma by achieving wealth-creation for business, individuals, and communities throughout Oklahoma. Five State Industry Clusters in major areas of employment throughout the state have been identified as driving wealth in Oklahoma:

- Aerospace and Defense
- Agriculture and Biosciences
- Energy
- Information and Financial Services
- Transportation and Distribution

The Governor's Council's focus is understanding the workforce needs of Oklahoma employers and ensuring education providers can meet those needs, and increasing the skills of Oklahoma workers in order to close the skills gap. Various solutions to these challenges are in sector strategies, attainment of credentials/degrees, reducing the high school dropout rate, and career pathways.

The Governor's Council includes private and public sector individuals that work together to support the governor's economic and workforce development vision (Oklahoma Works) across the state. The Council meets quarterly, however, interaction between its members occurs on a



regular basis. Initiatives that involve long-standing partnerships between private companies and public agencies are ongoing.

Private and public sector representatives also serve on Governor's Council committees charged with developing and recommending initiatives, pilots, best practices, etc., to enhance and implement Oklahoma's workforce and economic development strategy. The committees meet monthly or as needed to accomplish their goals and objectives.

## **Operational Structure, Decision Making Processes, and WIOA Implementation**

### **Executive Committee**

The Executive Committee is comprised of business members of the Council, including at minimum: the Chair, Vice-Chair, and the Co-Chair (private sector representative) from each of the Council's committees, excluding those who are non-members of the Council. The Executive Committee shall act in place of the Governor's Council only when necessary and with subsequent full board review, action, and ratification. It shall convey to the Governor recommendations posed by the Council, approve the direction of the Strategic Plan, develop the areas for tasks required for committees as warranted, appoint committee composition (Council members and at-large community members) and co-chairs, respond to the needs of the Council and its members, conduct an annual review of the Executive Director, and make staff capacity recommendations.

### **Workforce System Oversight Committee**

The Workforce System Oversight Committee (WSOC) makes decisions on program governance, policy and capacity building for the Local Workforce Development Boards and partnerships. The Committee serves as an oversight board and ensures compliance with WIOA. The WSOC has the following objectives:

- Certify Workforce Development Boards in compliance with the Workforce Innovation and Opportunity Act (WIOA).
- Continue designing, aligning and integrating Oklahoma's workforce/talent development and delivery system.
- Set system-wide metrics and performance expectations.
- Identify and conduct service delivery efficiency pilot projects.
- Research and identify operational and organizational strategies that will help make workforce boards stronger and service delivery better.
- Develop guidance to make the workforce system more effective and efficient.
- Development of the State Plan, Council Strategic Plan, and the Annual Report.
- Work with regional planning areas to develop planning documents.

### **Youth Program Committee**

The Youth Program Committee provides recommendations on policy and performance for the development and implementation of WIOA youth funded programs statewide. The Committee creates an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state's economic goal of building wealth creation for all Oklahomans. The Committee has the following objectives:

- Oklahomans are aware and supportive of the state's emerging workforce and the effect of current trends and issues.
- A youth system is developed through a collaborative effort of networking that is inclusive of all state and local youth organizations.
- The progress and impact of the youth system is benchmarked, measured, and rewarded and best practices reported.

#### Health Care Workforce Committee

The Health Care Workforce Committee informs, coordinates and facilitates statewide efforts to ensure that a well-trained, adequately distributed, and flexible healthcare workforce is available to meet the needs of an efficient and effective healthcare system in Oklahoma. The Committee has the following objectives:

- Statewide health workforce efforts are being coordinated through a single, centralized entity.
- Labor demand and program supply for 20 critical healthcare occupations are identified and quantified through the development of a longitudinal, multi-sourced data set that is available for public use.
- Strategies are in place to reduce identified supply gaps for 20 critical health occupations.
- At least five recommended policies and programs that support and retain an optimized health workforce have been implemented.

#### Career Pathways Committee

The Career Pathways Committee makes recommendations, informs, coordinates and facilitates statewide efforts to improve Oklahomans' exposure to high-demand career and entrepreneurship opportunities, along with the education and training required for entry into and advancement within a chosen career. The Committee develops industry sector strategies in state and regional ecosystems to ensure that the education and training system is delivering the skills needed by employers. The Committee has the following objectives:

- Create a plan for Career Pathways efforts to be based on industry sectors within Oklahoma's state and regional ecosystems.
- Create and use Career Pathways approaches to increase the proportion of low-skill learners who ultimately earn a degree.
- Increase high school graduation rates - decrease high school dropout rates.
- Increase the percentage of Oklahoma workers with a postsecondary credential.
- Make Career Pathways part of the Board certification process.
- Develop or research pilots, models and best practices.

#### Governor's Workforce Advisory Ad Hoc Committee

Governor J. Kevin Stitt created a statewide committee focused on developing regional strategies to develop workforce through strengthened partnerships between education and economic development. This committee has become an ad hoc committee of the Governor's Council to ensure alignment with state workforce development goals and strategies. The Advisory Committee has the following objectives:

- Economic Growth.
- Education Effectiveness.

- Government Efficiency.

## **Functions and Processes**

### **State Plan**

The Governor's Council assists the governor in the development, implementation, and modification of the State Plan by assigning staff from various entities represented on the Governor's Council to collaborate on the initiatives included and the writing of the plan.

The Governor's Council develops linkages through its members. This regular contact among partners allows for constant collaboration on issues.

### **Local Plans**

The Governor's Council's Workforce System and Oversight Committee reviews local plans submitted from each of Oklahoma's workforce development areas. This review ensures that the local plans align with the Unified State Plan and that those local plans are demand-driven with significant input from identified local industry representatives. The Council provides technical assistance to local areas in the development of their plans, if needed.

### **Designation of Workforce Development Areas**

The Governor's Council recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, Workforce Development Boards, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

Due to continued reductions in funding, and in an effort to increase funding for direct client services, Oklahoma has made a concentrated effort to work in conjunction with local areas to encourage them to seek re-designation and look at ways to streamline administrative costs. As an example of the state's efforts in this area to improve effectiveness and efficiency, since 2016, Oklahoma has reduced the number of local workforce areas from 11 to 7 and reduced the number of fiscal agents from 10 to 5, since 2010. Oklahoma has seven (7) workforce development areas and five (5) fiscal agents.

### **Local Workforce Development Board Certification**

The WIOA Section 107 states that the governor of the State, in partnership with the State Board, shall establish criteria for chief local elected officials in the local areas for the appointment of members of the local boards. The certification process is the key strategy to ensure Local Workforce Development Boards have the proper membership and structure to be highly effective in creating and continuously improving an aligned workforce development system, overseeing funds effectively and achieving established performance measures.

The Governor's Council approves the two-year certification process for the Local Workforce Development Boards. The policy, OWDI 05-2017, found on the OklahomaWorks.gov, website at <http://oklahomaworks.gov/wp-content/uploads/2016/04/OWDI-05-2017-WIOA-LWDB-Membership.pdf>, provides certification guidance and also clarifies local board membership

nomination and appointment as well as the requirements for greater collaboration with stakeholders in their areas including economic development, education, organized labor, transportation, housing, and other sectors, with everyone moving towards the same goals to create community workforce solutions. As a convener of partners and employers, the Local Workforce Development Board has a key role in creating that alignment.

All local workforce boards must be certified by the State showing proper membership established by the governor and the U.S. Department of Labor.

The following Local Workforce Development Boards in Oklahoma have submitted the proper documentation to the Oklahoma Office of Workforce Development and after review by the Governor's Council Workforce System Oversight Committee (WSOC) for accuracy, the WSOC recommended to the full Council that the Local Boards be approved. The Governor's Council approved the Board certifications.

Local Boards that received a two-year certification:

- Central Workforce Development Board
- Eastern Workforce Development Board
- Northeast Workforce Development Board
- Western Oklahoma Workforce Development Board
- South Central Workforce Development Board
- Southern Workforce Development Board
- Tulsa Area Workforce Development Board

### Policy Alignment

Policy alignment for Oklahoma's workforce and economic development system is a foundational goal for the Governor's Council. Primary efforts to align policy among the public agencies involved with workforce development and to ensure that policy enhances service delivery to employers, job seekers, and all sub-populations covered by WIOA occur through the initiatives detailed in this plan and include: career pathways, performance and data, and the One-Stop system and Local Workforce Board certification processes. All of these efforts occur under the umbrella of the Governor's Council.

### Leveraging Resources

The public agencies involved with Oklahoma's workforce development system have agreed within the parameters of their own unique missions, they will jointly collaborate to:

- Link workforce and economic development;
- Support the Governor's Council for Workforce and Economic Development plan and the governor's vision for an aligned workforce and economic development system;
- Create a demand-driven system;
- Respond to demand skills within targeted industries;
- Support the Workforce Partners Team;
- Build on the strength of each partner for the common good;
- Model state collaboration as an example for local entities to follow;
- Demonstrate agency commitment to common goals;

- Seek alignment of service delivery for better client access;
- Support and encourage local partnerships and joint planning; and,
- Leverage and link program initiatives where possible for the purpose of achieving broader economic development goals.

The State conducts monitoring and provides technical assistance to local WDBs to ensure that WIOA Title I funds are not duplicated by other services. The State has encouraged regional planning for local partnership development and continues to find ways to add value to partners and increase participation in system operations.

As formula funding continues to fluctuate, Oklahoma will continue to explore workforce system efficiencies and effectiveness. Currently, a sub-committee of the Workforce System Oversight Committee which includes state and local partners and stakeholders is working toward a system certification process that will ultimately provide a statewide framework and specific outcome standards so that our workforce system will be consistent, aligned and streamlined to find efficiencies and reduce duplication.

Regional and local plans approved in 2017, asked local WDBs to discuss how their regions are building partnerships and processes that incorporate integrated service strategies to better serve their citizens

Local workforce areas submitted regional plans that provided details on the current levels of alignment and collaboration and how they will be enhanced. The local boards also provided details on their efforts to reduce duplication of services and costs and to leverage resources under a regional service delivery approach.

#### Oklahoma Regional Training and Development

The Governor's Council for Workforce and Economic Development (GCWED) takes its role as the provider of training and development for the workforce system seriously. As such, training is focused on all system partners, in addition to the WIOA Core Partners identified in this plan. Training is provided annually at the Oklahoma Works Partners Conference in the spring of every year, as the result of a partnership with the Oklahoma Workforce Association (OWA), a group made up of state and local workforce staff. Training and Development often occurs in collaboration with other state agencies, and are provided as a result of public-private partnerships. Training is also provided on a variety of topics each year. A list of partnership organizations and resulting training and development provided by the GCWED are below.

#### Oklahoma Association of Workforce Development Boards (OAWDB)

GCWED provides staff support for an association run by the leadership of the local boards. The organization has been in existence for several years and has been a strong resource for the state board to receive local area input, and for the local areas to have opportunities to discuss issues across regions at an executive level. Historically, the GCWED partners with the OAWDB to provide training for local and state board members at least once per year. Opportunities include using meetings as strategy sessions, providing high-level strategy for all local areas to use, and using the venue for creative problem- solving for policy and systemic change.

#### Oklahoma Workforce Association (OWA)

The Oklahoma Workforce Association is an organization of all the core, required, and any workforce development partner wishing to enhance Oklahoma's talent development. This organization was built on the premise that we cannot do it alone and must rely on the partners that have the expertise to fill in the blanks for our customers. The executive committee is made up of at least one member of each agency or organization involved in the Oklahoma Works system. With its vast membership OWA is responsible for coordinating and planning of the Oklahoma Works Partners Conference each year, to provide topics and information to benefit the whole system.

Their main purpose: To support the purpose of the Workforce Innovation and Opportunity Act, referred to as WIOA, to strengthen the Oklahoma workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the state, and to promote individual and statewide economic growth.

## **2. Implementation of State Strategy**

Describe how the lead State agency with responsibility for the administration of each core program or a Combined State Plan partner program included in this plan will implement the State's Strategies identified in Section II(c) above. This must include a description of -

### **A. Core Program Activities to Implement the State's Strategy**

Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

Oklahoma has established a work group of stakeholders in the Workforce Development system called the System Oversight Subcommittee to create solutions to barriers and hurdles that were preventing success to the system. The Oklahoma Works System Oversight Subcommittee is composed of Oklahoma workforce development system partners, led and established by the Governor's Council for Workforce and Economic Development Workforce Systems Oversight Committee.

A member of the GCWED is the leader of the System Oversight Subcommittee. System partners include: the Oklahoma Department of Career and Technology Education—Adult Basic Education, the Department of Rehabilitation Services - Vocational Rehabilitation, the Department of Human Services, the Oklahoma Employment Security Commission--Wagner-Peyser, the State Regents for Higher Education, and Title I programs representing Adults, Dislocated Workers and Youth. It is hoped that other entities, such as the Department of Corrections, Department of Commerce, and the Departments of Health and Mental Health will be added to establish a more comprehensive approach for creating solutions.

This subcommittee was designed to carry out the strategic mission of GCWED and reports to the Workforce System Oversight Committee of that body. The committee identifies, reviews, and

writes policies and processes that align, build, and improve the workforce development system in order to fully implement the objectives outlined in WIOA, as well as contribute to Oklahoma's overall economic well-being. They meet on a regular basis and identify program specific barriers and create solutions to move forward.

The monitoring process includes a review of financial contributions and processes, engagement of the one-stop partners in the system, and other factors that improve workforce development collaboration and customer focus. This subcommittee assists local areas with challenges including the development of Memorandums of Understanding at a state and local level addressing service delivery and resource sharing, the creation of processes to address cost and resource sharing, and establish pilots to engage voluntary involvement of State Agency Directors and Chief Financial State Agency Officers. The WIOA also requires local planning regions to write unified plans. The sub-committee wrote draft guidance for these plans which included input from all the agencies involved. The benefits are:

- A more effective, consistent, user-friendly, customer-focused, high quality service delivery approach for Oklahoma citizens and businesses
- Efficiencies for workforce programs and staff
- Alignment among education, workforce, and economic development
- Accountability for services and results o A maximization of all workforce development resources
- A true competitive advantage for Oklahoma's economic development efforts
- A pipeline for Oklahoma of appropriately skilled and credentialed workers ready to meet the employment needs of Oklahoma employers

## **B. Alignment with Activities outside the Plan**

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The Governor's Council for Workforce and Economic Development (GCWED), with input from state workforce partners, local areas, and business leader members, adopted a strategic plan for achieving WIOA implementation and strategy alignment with the Governor's vision. Included in the plan are four objectives and sub-strategies aligned to the Governor's workforce committee plan.

Objective 1: Expand Oklahoma's workforce to satisfy industry and economic development goals

- Support career exposure, exploration, and pathways for high school students
- Increase targeted programs for special populations
- Analyze barriers to employment for Oklahomans
- Expand adult basic education and high school equivalency services/programs

Objective 2: Upskill Oklahoma's workforce

- Expand Registered Apprenticeship and other work-based learning opportunities
- Strengthen education's focus on career readiness
- Increase high school equivalency attainment

- Increase the percent of Oklahomans with a postsecondary credentials/degree

Objective 3: Offer workforce solutions to Oklahoma's businesses

- Engage businesses in program design and service delivery
- Develop and provide responsive recruiting tools
- Launch incumbent worker training
- Develop strategic Business Services plan
- Launch skills-based hiring pilot
- Expand sector partnerships

Objective 4: Build Oklahoma's workforce system capacity

- Drive innovation
- Diversify funding
- Expand data assets and usage

In order to achieve the ambitious goals that have been set by the Governor's Cabinet, workforce partners must align their efforts and take active roles in ensuring resources are used in ways that maximize, strengthen, and support the education to workforce pipeline for all Oklahomans.

Underpinning all Oklahoma Works efforts are the five Industry Clusters (Aerospace and Defense, Agriculture and Biosciences, Energy, Information and Financial Services, and Transportation and Distribution), and 100 Critical Occupations within these ecosystems (growth and demand occupations). These foundational pieces are utilized by state and local economic development and tie partner initiatives together in an aligned, cohesive direction.

The Core Partners and required and optional one-stop delivery system partners are engaged in education and training activities at the state/system level. Currently, the Workforce System Oversight Subcommittee, the working arm of the Workforce System Oversight Committee of the Governor's Council for Workforce and Economic Development, is tasked with developing the system-wide framework and policy documents that will comply with WIOA legislation and Federal regulations, and are tasked with compliance review of the system.

The Governor's Council for Workforce and Economic Development (GCWED), the WIOA State Board, is tasked with using data to inform policy, track progress and measure success toward federal, WIOA measures and state metrics identified through the strategic planning process. The GCWED Strategic Plan assists partners with aligning education and training programs to meet the talent demands of Oklahoma employers. This alignment aids in the development of a comprehensive workforce development system within each region that:

- Creates user-friendly, customer-focused service delivery models that transcends agency programs and silos;
- Provides consistent, high-quality services to employers and job seekers throughout the state;
- Ensures services to employers and job seekers are consistent, while encouraging local and regional adaptation; and
- Creates stellar customer focus, program alignment and partner collaboration.

Each region's certified system is the "network of mandatory and optional partners, programs, centers and service providers that collectively address the community's workforce development needs. To create this workforce development system, partners must



- look at the system holistically;
- look at where their particular agency and its services fit into the larger vision; and,
- commit to jointly producing the tools and processes needed to implement a workforce system.

The process evaluates:

- how well partners are working together to create a skilled and credentialed talent supply chain to help employers grow and prosper
- whether a region has built a local workforce development system from all of the local players who provide workforce development services and products to job seekers, trainees, and businesses within the region.

The process verifies that a region has implemented an effective and comprehensive workforce development system strategy that includes:

- A community-wide unified workforce development plan based on the competency requirements (skills, knowledge, and abilities) needed for current and future local jobs that are key to community growth and prosperity
- A common workforce development vision shared by all partners within the community
- Common goals to reach that vision shared by all partners within the community
- An approach to serving job seekers that is integrated across all the partner agencies
- An approach to serving businesses that is integrated across all the partner agencies

## **C. Coordination, Alignment and Provision of Services to Individuals**

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas The activities described shall conform to the statutory requirements of each program.

Oklahoma believes the coordination, alignment and provision of services will further enhance the customer experience. In order to promote a seamless service delivery, key stakeholders such as the State Administration, Workforce Development Boards (WDB), Oklahoma Works Centers, and other Core Partners will collaborate to develop an integrated approach to providing quality, customer driven, value-added services. As a state, we realize the importance of nurturing a partnership with the core programs defined in WIOA and business. Creating this partnership will allow all stakeholders to have input and buy-in to the one-stop seamless delivery of services. This approach will effectively organize staff and facilities in a manner that further streamlines customer service delivery, capitalizes on the strengths of staff, location, and technology capabilities. All these efforts will reduce duplication, save diminishing resources, increase customer satisfaction, and better develop our valued service delivery professionals.

Common performance measures also encourage joint responsibility for the success of all customers across the core programs and ensure access as well as the delivery of available one-stop services. Staff provide access to services based upon the customers' assessed need. Whether customers access services at a comprehensive center, an affiliated site, a network of eligible one-stop partners or a specialized center as described in WIOA § 678.300, they will be provided

information on the availability of career services, training services, program services and activities offered and/or provided.

Coordination and alignment within the Oklahoma Works Centers is achieved by two main processes required by policy set forth in Oklahoma Workforce Development Issuance 04-2016, Local Elected Official (LEO) Consortium Agreement. Policy 04-2016 requires each area's LEOs to enter into an agreement; this agreement identifies the responsibilities of the LEOs collectively. One requirement is to agree on a Memorandum of Understanding (MOU) developed and executed by the Local WDB. The MOU is the result of the negotiations between one-stop partners, relating to the operation of the one stop delivery system and approved by the CLEO in the local area as described in WIOA § 678.500. The MOU covers items such as: description of services to be provided in the one-stop system; an agreement on funding costs of services and operating costs of the system including infrastructure costs; funding of shared services and operating costs for one-stop delivery system; methods for referring individuals between partners for appropriate services; and procedures ensuring customers with barriers to employment, including those with disabilities, are addressed by providing access to services, whether in person or virtual, are available through the one-stop delivery system. Alignment of services will more accurately reflect to state and federal mandates, stakeholders, the public, and other interested parties on how the public workforce system is meeting the needs of business, the workforce and contributing to economic growth.

Another requirement in the consortium agreement is to agree on designation and certification of a one-stop operator through a competitive process developed and executed by the Local WDB. A one-stop operator that has been competitively procured will ensure that all one-stop partner services are coordinated and are provided in accordance with federal, state and local policies. This will assure seamless service delivery and oversight.

Oklahoma recognizes the need to provide career services through the one-stop system by the required one-stop partners defined in the WIOA. The first service option is basic career services. The first option consists of providing information on available services in the onestop center, initial assessments, eligibility determinations, career planning, access to the career resource room for computer assistance and self-service options, resume preparation assistance, labor exchange services, labor market information, referrals to other system programs, demand occupation lists, eligible training provider lists, available supportive services, meaningful assistance for unemployment assistance claimants, and financial aid assistance.

Individualized career service is the second service delivery option. In this option customers have access to: customized assistance and specialized assessment of their skills knowledge and abilities to assist in career planning; diagnostic testing and other assessment tools, in depth interviewing and evaluation; development of the individual employment plan; training services which may include short-term pre-vocational services, on-the-job training opportunities, internships and work experiences, English language acquisition; financial literacy services and out-of-area job search and relocation assistance.

Third, follow-up services must be made available as determined appropriate by the Local WDB, for a minimum of 12 months following the first day of employment, to adults or dislocated

workers who are placed in unsubsidized employment. Priority of services to Veteran and other eligible persons will continue to be Oklahoma's priority. Additionally, the commitment to serve the individuals listed in the WIOA legislation such as persons with disabilities, unemployment insurance recipients, long-term unemployed, dislocated workers, low income individuals, limited English proficiency individuals and youth still remains and will continue be a focal point in the one-stop service delivery

## **D. Coordination, Alignment and Provision of Services to Employers**

Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

Under the leadership of the Governor and the Governor's Council (State Workforce Board), the Core Partners are expanding their focus on employer services to cultivate engagement and productive relationships among business leaders in the private sector, Oklahoma's education and training systems, and other workforce partners. These strong relationships will facilitate essential knowledge sharing and encourage the alignment of statewide and regional business and industry needs with the skills taught throughout Oklahoma's education system.

One of the local board's roles is to coordinate workforce investment activities with economic development strategies through regional planning. Board representatives include all required system partners as well as employers that are representative of the local areas economic drivers. Workforce Boards are employer driven and service delivery strategies are determined by employers needs and implemented by the partnership.

Oversight of the system falls upon the Governor's Council whose mission is to assist the Governor in the development, recommendation and implementation of policies and programs within the workforce system. The Governor's Council operates in accordance with the functions contained in WIOA to oversee Oklahoma's Workforce Development System. The purpose of the Governor's Council is to:

- 135. Guide the development of a comprehensive and coordinated workforce development system for the state and monitor its operation; and
- 136. Review and make recommendations that will align the workforce system, including education, with the economic development goals of the state for the purpose of creating workforce and economic development systems that are integrated and provide Oklahoma a competitive advantage in a global economy.

Members of the Governor's Council representing organizations, agencies, or other entities are individuals with optimum policymaking authority within their organizations, agencies or entities. In order to provide the Governor with wide-range perspective on workforce policy issues, the members of the Governor's Council represent diverse regions of Oklahoma, including urban, rural, and suburban areas from both the public and private sectors.

A major driver in coordination of employer needs is the Workforce System Oversight Committee of the Governor's Council. The Workforce System Oversight Committee is co-chaired by a member from the private sector and a member from the public sector. The Oversight Committee makes decisions on program governance, policy, and capacity building for the Local Workforce Development Boards and partnerships helping assure policies and practices are business driven. The Governor's Council, Local Workforce Development Boards, and regional planning coordination of services to employers will create the driving force and synergy needed to build a well-trained, dynamic workforce that will meet the needs of the 21st Century employers, generating wealth for all.

### **Employer Services Offered by Workforce Partners include:**

#### **Wagner-Peyser at the Oklahoma Employment Security Commission**

- Talent Acquisition Teams work with local employers to understand their business and the needed experience, training, and expertise for employees.
- Local Employer Councils offer educational presentations for employers surrounding relevant employment needs.
- Job Fairs are held regularly across the state connecting employers and job seekers.
- On Site Recruitment Events are held at the Oklahoma Works Centers statewide.
- An intuitive Labor Exchange System, OKJobmatch.com, connecting employers with capable, qualified applicants, providing staff-assisted service to expedite filling job openings with qualified, talented employees, and featuring user-friendly applicant management tools.
- Rapid Response Services are provided with the goal of helping affected workers move into new employment as quickly as possible.
- Labor Market Information, both timely and relevant, is provided regarding Oklahoma and the U.S. economy.
- Work Opportunity Tax Credit is offered to employers as an incentive to hire individuals who are members of targeted groups which have traditionally faced significant barriers to employment.
- Federal Bonding provides a fidelity bond for at-risk job seekers that protects the employer in case of any loss of money or property due to employee dishonesty.
- Assistance in applying for potential services under the Trade Adjustment Assistance program for those employers who may be experiencing downturns and otherwise qualify.
- Pre-employment assessments to measure job candidates' proficiency in typing, data entry, and Microsoft Word and Excel.

#### **Adult Basic Education at the Oklahoma Department of Career and Technology Education**

- Full-time programs are geared to the needs of business & industry. Many result in industry certifications
- Industry-specific training - Customized short-term training for companies that introduce a new process or product
- Training for Industry Program - Customized start-up training for wealth generating companies
- Adult Basic Education and High School Equivalency (HSE)

## **Vocational Rehabilitation Services at the Oklahoma Department of Rehabilitation Services**

- Vocational Rehabilitation and Services to the Blind and Visually Impaired staff help employers reduce turnover by matching qualified, job-ready applicants to job requirements.
- Provide pre-employment testing and offer job-related training for individuals we refer. On-the-job training and support services can be customized for the employee, if needed.
- Provide follow-up services to ensure employees' success on the job and help with affirmative action programs by referring qualified applicants with disabilities.
- Assist employers with and needed job accommodations.

## **Title I Programs at the Oklahoma Office of Workforce Development**

- Administer adult, dislocated worker, and youth WIOA programs.
- Provide Rapid Response Services with the goal of helping affected workers move into new employment as quickly as possible
- Provide job fairs to veterans and their families
- Offer customized business services including such things as incumbent worker training, Registered Apprenticeship Program development, sector partnership development, and providing labor market information to employers

## **Local Workforce Development Boards (Seven)**

- Local workforce development boards and employment service offices provide job fairs for laid off employees and veterans which helps local employers who are hiring get seasoned employees
- Work with local employers to understand their workforce needs
- Training to meet the needs of employers

## **Registered Apprenticeships**

- Oklahoma is actively working to expand and diversity RA in the state
- The U.S. Department of Labor, Office of Apprenticeship has over 100 active RA programs in Oklahoma through which companies are gaining trained employees

## **Oklahoma Department of Commerce**

- Helps employers get in touch with sources for a trained workforce
- Provides incentives to qualifying companies that create well-paying jobs
- Connects employers to customized training resources Oklahoma is also planning on utilizing the peer-to-peer TA opportunities provided by the USDOL on business services.

## **E. Partner Engagement with Educational Institutions**

Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

## **Strategic Priorities**

Oklahoma's education leaders and training providers are a vital part of the state's workforce board. The Governor's Council for Workforce & Economic Development includes the State Superintendent of Public Instruction, Chancellor of the State Regents for Higher Education (2- and 4-year institutions), and the Director of the Oklahoma Department of Career and Technology Education as participants.

Oklahoma's Strategy for partner engagement with education and training providers includes: Developing, aligning and connecting the education and training pipeline with the needs of the state's regional economies by coordinating strategic priorities and plans across the education and the workforce system. Oklahoma is aligning and connecting across state agencies, including 2-year, 4-year, and career and technical education institutions, as well as in the local areas among state agencies and businesses, and from the local areas to the state level. The State's priorities include:

- Career Pathways: Improving Oklahomans' exposure to Career Pathways and career options, along with the education and training required for entry into and advancement within a career is necessary in order to increase the number of Oklahomans in the education-to-workforce pipeline and to maximize state and local resources aligning Career Pathways and career options with the needs of Oklahoma businesses to ensure more Oklahomans are aware of viable paths to career entry and career building, exposed to careers at an earlier age, empowered with the information needed to best use valuable resources, and workforce-ready faster.
- Credential Attainment: Increasing credential attainment, including postsecondary and high school equivalency certificates, and improving access to the supportive services necessary to complete education and training.
- Registered Apprenticeship: Increasing and diversifying the number and types of Registered Apprenticeship Programs available in the state, including youth apprenticeship, pre-apprenticeship and traditional apprenticeship programs.

## **Work-Based Learning**

Oklahoma Works has also prioritized diversifying and expanding work-based learning opportunities as a vital component of strengthening career pathways, increasing credential attainment, and closing the skills gap. To do this, Oklahoma Works partner agencies, including 2-year, 4-year, and career and technology education institutions, are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies like Registered Apprenticeships, OJT, work experience, and job shadowing. In November 2017, to further support work-based learning in Oklahoma, the state announced a statewide goal through Executive Order. The goal, known as Earn and Learn Oklahoma, is to increase the number of internships and apprenticeships in the state to 20,000 by the year 2020.

## **F. Partner Engagement with Other Education and Training Providers.**

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

The Governor's Council for Workforce and Economic Development has developed a policy in accordance with WIOA for the application process to be used by schools wishing to be on the eligible training provider list. The intent is to create as many pathways to education as possible for interested student/participants. Eligible training and education providers will strategize how we can update our services to be more job-driven and meet employers' needs. Using the state's strategies, we will collaborate with our educational leaders and partners to create accessible training programs that meet the needs of our customers and will provide them with meaningful training. Oklahoma's education leaders include the State Superintendent of Public Instruction, Chancellor of the State Regents for Higher Education, and the Director of the Oklahoma Department of Career and Technology Education.

For training providers to receive WIOA funds for the provision of training services, they must meet certain performance and reporting-related criteria to be included on the Eligible Training Provider List (ETPL). This does not apply to Registered Apprenticeship (RA) programs as these evidence-based programs are placed on the statewide ETPL automatically.

Oklahoma's Eligible Training Provider List (ETPL) is available electronically at the OKJobMatch.com website. This list is an important tool for participants seeking to earn credentials, certificates or degrees in one of Oklahoma's targeted occupations. Oklahoma's list offers a wide range of programs, including classroom, online, and registered apprenticeships. Another important tool for participants is the Oklahoma Career Guide website. OK Career Guide is the state's computerized career information system. It is an easy online tool available for all Oklahomans to explore and guide their future. Individuals can take assessments, identify occupations, and establish education plans. It is a critical tool for middle and high school students as well as adults to access current career and labor market information.

RA programs technically turn Oklahoma employers into training providers. While prioritizing education and training resources to support placement into high demand occupations, Oklahoma businesses will be able to provide the hands-on training to build the skilled workforce they need to succeed. Oklahoma is focusing on an expansion of RA programs in the state, which will focus on creating and expanding RA opportunities.

Through Oklahoma's New Skills for Youth grant efforts, outcomes from the Career Readiness Initiative aligned K-12 career pathways and programs with the high-skill, high-demand needs of business and industry to better prepare students for success in college, technical/STEM careers and the 21st century world of work. This work has helped the state assure career pathways efforts are a part of every in-school youth's education experience.

The CareerTech Skills Centers School System is a division of the Oklahoma Department of Career and Technology Education. Skills Centers specializes in the delivery of career and technology education to inmates under the supervision of the Oklahoma Department of Corrections and juveniles under the supervision of the Oklahoma Office of Juvenile Affairs. The intent of this division of ODCTE is to continue to evolve as business and industry changes. The goal is to provide educational services that will cause skills centers students to seek and find success in the workplace and in society. Preparing these inmates for a successful transition and reentry by training these individuals for high wage, high skill, and/or high demand jobs is

necessary to reduce recidivism and assist individuals in becoming productive members of society as well as closing the skills gap for our business and industry.

## **G. Leveraging Resources to Increase Educational Access**

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

### **Centers of Workforce Excellence**

Oklahoma is working to establish Centers of Workforce Excellence that will be funded with non-federal dollars. The intent of the Centers of Excellence is to provide major employers with the opportunity to access a pipeline of skilled talent by aligning employer demands with the education systems that train their workforce. It allows companies competing in similar industries to participate with our state educational institutions to establish industry-centric Centers of Excellence. This industry and education collaboration is intended to define and deliver needed skills training, and ultimately, enable employers to remain competitive in the national and global economy.

Specifically, Centers of Excellence will define state CTE and higher education institutions as eligible entities to receive funding originating from an industry's withholding taxes. Those participating state institutions will be required to establish Centers of Excellence that can demonstrate collaboration with industry partners and provide employers with the education and skills training their workforce needs.

### **CTE Programs of Study**

One of the requirements of WIOA is that Perkins Act recipients are mandatory partners. For Oklahoma this will mean that public school career and technical education programs, technology centers, and almost all of Oklahoma's community colleges will strive to increase postsecondary opportunities for students in high school and improve workforce readiness. This has and will continue to occur through programs of study, which are utilized in Oklahoma to link secondary and postsecondary education with occupational outcomes and industry certifications and credentials. The intentional partnerships between secondary education, postsecondary education, and business and industry allow the state to streamline its secondary and postsecondary education and instruction with that of the workforce needs.

Programs of study must lead to two of the following three: high skill, high wage, and/or high demand occupations. Oklahoma defines a high wage career as one with an average hourly rate equal to or greater than the average hourly rate of all occupations as reported by the Oklahoma Employment Security Commission. A high demand industry is defined as an occupation in which state, local, or regional labor market data show that demand exceeds projected employment supply. High skill occupations require an industry recognized certificate, credential, postsecondary training, apprenticeship, or degree.

- Courses include rigorous, coherent CTE content aligned with challenging academic standards.



- Eligible recipient's Program of Study must offer students the opportunity to earn a postsecondary level industry certification and/or licensure or an associate or bachelor's degree.
- Postsecondary eligible recipients should ensure that academics are an integral component of all Perkins-funded CTE programs.

Each approved CTE program of study will include a specific non-duplicative sequence of CTE courses and the appropriate rigorous academics required to prepare CTE students for success in postsecondary education and the high-skill, high-wage, or high-demand workplace. CTE programs incorporate content aligned with challenging state and national academic standards in language arts, mathematics, and/or science. State recognized CTE technical skill and academic assessments benchmark student attainment of both academic and technical skills.

## **Skills Centers**

Over the forty-plus years of serving incarcerated offenders in Oklahoma, Skills Centers have evolved from a division with a few occupational training programs to a large school system with a multitude of programs and services for both adult and juvenile offenders. CareerTech has partnered with the Oklahoma Department of Corrections and has established 11 Skills Centers within correctional facilities that provide career and technical training opportunities to incarcerated individuals. Adult Basic Education is offered in most of these correctional facilities that also offer career and technical training programs. This allows funding to be provided that support Adult education and literacy activities, integrated education and training, Career pathways, concurrent enrollment, and transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

A successful transition from corrections to the workplace can mean a life of success for ex-offenders. To prepare offenders for successful transition, career and technical education, employability and life skills are integrated into this educational delivery system. Skills Centers students may seek certifications recognized by both state and national industries. The Skills Centers provides students with numerous interconnected and integrated components, each an integral part of preparing offenders for success in the workplace and in society. The Skills Centers works in conjunction with the Oklahoma Department of Corrections (DOC) and Oklahoma Correctional Industries (OCI) to offer a U.S. Department of Labor, Bureau of Apprenticeship and Training, registered apprenticeship programs for offenders in Cabinetmaking.

Through these and other programs the state will be able to leverage existing state, local, and federal investments and financial resources that enhance access to workforce development programs.

## **H. Improving Access to Postsecondary Credentials**

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

## **Oklahoma Adult Promise Initiative**

Oklahoma was one of four states awarded a three-year Lumina/SHEEO Adult Promise grant to engage adult learners with higher education. The grant focuses on strategies to help adults who have completed some college credit, but have not earned a degree, to return to complete degrees in one of Oklahoma's 100 Critical Occupations (growth and demand occupations). The program is targeting adult students aged 25-49 years with incomes below \$75,000. The grant funds provide infrastructure and outreach, but no direct dollars to support student tuition or wrap-around, supportive services. All funding to provide tuition, fees, and books to students will come from partners, including:

- Private sector business and industry;
- Workforce Development agencies;
- Native American Education offices;
- Nonprofit entities; and
- Higher education institutions who agree to seek degrees for these occupations.

## **Work-Based Learning Initiative**

Oklahoma Works has prioritized diversifying and expanding work-based learning opportunities as a vital component of strengthening career pathways, increasing statewide credential attainment, and closing the skills gap. To do this, workforce partner agencies, including 2-year, 4-year, and career and technology education institutions, are collaborating to implement the policies and infrastructure necessary to support work-based learning strategies like Registered Apprenticeship, job shadowing, and internships. Oklahoma would like to increase the number of apprenticeships and other work-based learning opportunities in the state to 20,000 by the year 2020.

Additionally, the Oklahoma Office of Workforce Development (OOWD) received a State Apprenticeship Expansion (SAE) Grant from the U.S. Department of Labor in 2019 to expand and diversify apprenticeship opportunities in Oklahoma. As a part of that grant, Oklahoma is working to:

- Expand the capacity of the OOWD and its partners to develop and register new apprenticeship programs.
- Develop apprenticeship outreach and communications plans to increase public awareness and conduct engagement activities with industry partners.
- Ensure more WIOA participants have access to Registered Apprenticeship opportunities.

The main strategy of Oklahoma's SAE Grant is to focus on creating and expanding RA opportunities within targeted industries, including: Finance, Public Service/Government, Retail, Child Care, Food Service, Public Utilities, Alternative Energy, Aerospace, and Health Care.

Strategies for expansion and diversification also include outreach to specific underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out of school youth. OOWD staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to

develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations.

The State is committed to fully integrating RA programs as an employment and training solution for one-stop centers. Local areas will have maximum flexibility in serving participants and supporting their placement into RA programs. There are several ways in which training services may be used in conjunction with these RA programs, including developing an Individual Training Account (ITA) for a participant to receive RA training, utilizing an On-The-Job Training (OJT) contract with an RA program for providing both classroom and on-the-job instruction; a combination of an ITA to cover the classroom instruction along with an OJT contract to cover on-the-job portions of the RA; and utilizing incumbent worker training for upskilling apprentices who already have an established working/training relationship with the RA program.

## **I. Coordinating with Economic Development Strategies.**

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies and activities in the State.

Oklahoma recognizes that workforce development must be linked to economic development. That is the reason Governor Kevin Stitt chose to make the Oklahoma Department of Commerce the Title I administrative entity effective December 31, 2019. Additionally, the link between workforce and economic development are made in several ways and at several levels.

### **Partnerships with the Oklahoma Department of Commerce**

The Oklahoma Department of Commerce partners to provide data support and economic development expertise. The Department of Commerce assists in Layoff Aversion and Rapid Response efforts and helps promote the resources and services available through WIOA Core Partner agencies. They also employ Rural Development Specialists (RDSs) who live and work in their assigned areas across the state. The RDSs call on companies, provide resource referrals as needed, and build relationships with companies. When companies experience difficulties, they often turn to the RDSs, who bring in a variety of resources to help solve problems. The Commerce Research Team provides research services for companies as needed. Proactive communications and call trips to corporate headquarters of Oklahoma companies, often by the Governor, help Oklahoma know of any issues corporate offices see at the local level. Issues can then be addressed effectively.

### **Labor Market Data**

At the state level, The Oklahoma Department of Commerce is the state's lead economic development entity and a participant of the Governor's Council on Workforce and Economic Development. The work of the Council is driven, in part, by data and business intelligence provided by the Department of Commerce.

### **Statewide Career Exposure Week**

Oklahoma Works hosted the first statewide Career Exposure Week in November 2017. The week-long event connected local students with area businesses to give future talent the

opportunity to explore the career possibilities in Oklahoma. Career Exposure Week events allow local businesses and employers to showcase critical careers in demand industries, to inspire and recruit new talent, and give all levels of the talent pipeline a front row seat to experience the wide array of careers available within the State. Sponsored events range from hosting on-site job shadow experiences, industry tours, classroom presentations or other activities targeted to students in K-12 and beyond. Oklahoma Career Exposure Week was created to:

- Introduce people to careers in businesses and industries in Oklahoma's Driver and Complementary ecosystems and Critical Occupations;
- Empower Oklahoma businesses and industries in the state's ecosystems and KEN regions to engage with educators, students, parents, and others about career opportunities;
- Change misconceptions of Oklahoma's demand and critical occupations and the businesses and industries in Oklahoma's driver and complementary ecosystems;
- Draw attention to the roles businesses and industries play in communities across the state; and
- Underscore the economic and social significance of demand and critical occupations and businesses and industries in Oklahoma's ecosystems.

Economic development organizations are among the partners who make this annual event successful, including organizations like the Tulsa Chamber and the Duncan Area Economic Development Foundation. Oklahoma continues to work with partners to expand Career Exposure Week as a way to prepare youth and individuals with barriers to employment for the workforce.

### **Governor's Summit on Economic Development and Workforce**

In 2019, Governor Stitt hosted the Governor's Summit on Economic Development and Workforce. The event brought together business, economic development and workforce leaders to focus on the alignment of state priorities. This will be an annual event with the next Summit scheduled for the summer of 2020.

## **b. State Operating Systems and Policies**

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in **Section II Strategic Elements**. This includes -

### **1. The State operating systems that will support the implementation of the State's strategies. This must include a description of—**

#### **A. State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).**

Oklahoma uses OKJobMatch.com, operated by AJLA, as its statewide job bank and case-management system. The current system is available for job-seekers looking for work in all 77 counties as well as providing employers a place to search for talent and post jobs. AJLA

coordinates case management for programs operated by OESC (Title III) and OOWD (Title I) under WIOA.

Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) currently utilizes LACES (Literacy, Adult and Community Education System) by LiteracyPro Systems, a developer of data management systems for the public and nonprofit sectors. LACES is an online student data management software with the capability of generating daily reports. Engineered for providers of literacy, Adult Basic Education (ABE), and correctional education programs, LACES allows case managers to easily set baselines, track program progress, student goals, and deliver results and streamline data reporting to state and federal agencies.

The Oklahoma Department of Rehabilitation Services (OKDRS) is utilizing the AWARE case management system by Alliance Enterprises. Alliance Enterprises, Inc. maintains the case management system used by more than 35 Vocational Rehabilitation state agencies throughout the country. In addition to serving as a tool for managing services for vocational rehabilitation programs under Title IV of the WIOA, it also produces reports to meet the reporting requirements of the U.S. Department of Education, Rehabilitation Services Administration.

The OklahomaWorks.gov website serves as the comprehensive platform for many of Oklahoma's workforce development activities. It is also fully accessible to our wide range of partners. OK-WDES was created as a multi-agency data repository to house workforce- and education-related data that provides a platform for linking data across data-generating agencies necessary to improve data collection and dissemination, and to inform and support the objectives of Oklahoma Works. OK-WDES was partially funded by a Workforce Data Quality Initiative (WDQI) grant and will be developed further as data MOUs are executed and new statewide performance metrics are measured under Governor Stitt.

AJLA was chosen as the state's labor exchange and case management system. Oklahoma elected to implement FiscalLink, AJLA's fully integrated fiscal management module to assist with annual report requirements for the state to OKJobMatch, Oklahoma's virtual case management system. FiscalLink works to provide a real-time seamless fiscal system for one-stop case management. FiscalLink aids with tracking of training and career service costs per participant as well as producing reports.

The FiscalLink implementation was a collaborative effort between local area representatives, the Oklahoma Employment Security Commission (OESC), OOWD, and AJLA. This included data collection, data validation, data conversion, user acceptance testing, and implementation training.

## **B. Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers<sup>10</sup>.**

Currently, workforce programs including Wagner-Peyser and the WIOA Title I Youth, Adult, and Dislocated Worker Programs utilize Oklahoma's virtual case management system,

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<sup>10</sup> For the PY 2016 state plan, descriptions of data collection and reporting processes need only include currently known indicators.

OKJobMatch for data collection and reporting processes. OKJobMatch is a vendor hosted management information system provided by America's Job Link Alliance - Technical Support (AJLA-TS). OKJobMatch houses data collection applications JobLink, ServiceLink, ProviderLink, FiscalLink, and ReportLink. Each data collection application is compliant with WIOA Section 116 which requires the establishment and operation of a fiscal and management accountability information system based on guidelines established by the Departments. Wagner-Peyser and Title I works with AJLA-TS to ensure that data is collected in accordance with WIOA Section 116 and The Participant Information Record Layout (PIRL) established by the Departments. AJLA-TS provides appropriate PIRL files and ReportLink is utilized to verify the data and verify any errors present within the PIRL files, once errors are corrected and data is verified the files are then uploaded and submitted to the Department of Labor.

The Oklahoma Office of Workforce Development, in conjunction with the Oklahoma Employment Security Commission (OESC), work continually to ensure that OKJobMatch.com is efficiently meeting all federally and state mandated reporting and performance requirements. The data collection and reporting goals of the Oklahoma Office of Workforce Development (OOWD) are to ensure the timely, complete, and accurate collection of participant data at intake which provides the State and Local areas the ability to evaluate and project performance, evaluate and project program outcomes, share reliable data across core partners, maintain data integrity and provide accurate performance reports. OKJobMatch.com reporting features provide the ability to run performance and case management reports at any time providing real time data which allows OOWD, Local Boards, One Stop Operators, and Service Providers to monitor data and performance as needed. WIOA Quarterly and Annual Reports are available to view at any time with the understanding that the data can change daily and an official report is not available until 45 days after the end of the reporting quarter.

The data collection and reporting goals for OESC are accurate data when pulling OKJobMatch quarterly reports 45 days after the end of the reporting quarter and UI wage information provided by employers on a quarterly basis. Both OKJobMatch quarterly reports and UI wage data are available on a quarterly basis, specifically 45 days after the end of the reporting quarter. Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) currently utilizes LACES (Literacy, Adult and Community Education System) by LiteracyPro Systems, a developer of data management systems for the public and nonprofit sectors. LACES is an online student data management software with the capability of generating daily reports. Engineered for providers of literacy, Adult Basic Education (ABE), and correctional education programs, LACES allows case managers to easily set baselines, track program progress, student goals, and deliver results and streamline data reporting to state and federal agencies. ODCTE and LACES are working to finalize data transfer to the AJLA case management system to allow for data reporting to the local boards on a quarterly basis.

The Oklahoma Department of Rehabilitation Services (OKDRS) is utilizing the AWARE case management system by Alliance Enterprises. Alliance Enterprises, Inc. maintains the case management system used by more than 35 Vocational Rehabilitation state agencies throughout the country. In addition to serving as a tool for managing services for vocational rehabilitation programs under Title IV of the WIOA, it also produces reports to meet the reporting requirements of the U.S. Department of Education, Rehabilitation Services Administration.

OKDRS and AWARE recently finalized a data transfer process to the AJLA case management system to allow for data reporting to the local boards on a quarterly basis.

## **2. The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system.**

All Oklahoma Works workforce system policies will support the alignment of service delivery. Policy development and process is a collaborative approach, utilizing the System Oversight Subcommittee (SOS) members who draft and revise system policy as well as subject matter experts and workforce development stakeholders who provide feedback to policies as they are developed. The Workforce System Oversight Committee (WSOC) reviews all policy upon release. The full list of current policies can be accessed through the Oklahoma Works website at: <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

### **State policies**

The active policies that support implementation of state strategies are as follows:

- **OWDI 08-2019 Adult and Dislocated Worker 40% Minimum Training Expenditure Rate:** To provide guidance for the State's required 40% minimum training expenditure rate of the Title I Adult and Dislocated Worker funds.
- **OWDI 09-2019 Incumbent Worker Training Services:** To provide guidance to local workforce development boards (LWDBs) regarding participant eligibility for Incumbent Worker Training (IWT) and employer eligibility for IWT reimbursement.
- **OWDI 07-2019 Use of Grant Funds to Pay for the Cost of Meals, Food, Coffee or Other Refreshments:** To provide guidance to the Local Workforce Development Boards on the provision of utilizing Federal funding to provide meals for external customers and employees.
- **OWDI 06-2019 2019 Poverty Guidelines & LLSIL:** To communicate the updated poverty guidelines released by the United States Department of Health and Human Services that may be used to calculate income levels to determine eligibility for participation in various state and federally funded programs and to prioritize services.
- **OWDI 09-2017, Change 2 WIOA Core Performance Measures:** To communicate Oklahoma's guidelines under which Local Workforce Development Boards (LWDBs) must develop and implement procedures for the operation of the performance accountability system under WIOA. This guidance clarifies various aspects of the operational parameters and specifications of performance indicators.
- **OWDI 05-2018, Change 1 Oklahoma Works Waiver Request Policy:** To provide guidance to Oklahoma's program practitioners, workforce development boards, partner

organizations and others to clarify the state's policy and procedures on requests for WIOA flexibility waivers.

- **OWDI 01-2018 Nondiscrimination and Equal Opportunity Complaint Procedures Change 1:** To provide guidance on the WIOA Section 188 Discrimination and Complaint Procedures.
- **OWDI 05-2019 Nondiscrimination and Equal Opportunity Corrective Actions and Sanctions:** To inform grant recipients of the sanctions that may be imposed for violation of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA), and to outline the procedures to achieve voluntary compliance via corrective action/remedy.
- **OWDI 14-2017 Rapid Response Activities and Layoff Aversion Change 1:** To communicate the State Policy concerning Rapid Response and Layoff Aversion activities conducted by the State and/or Local Rapid Response Teams and to establish a basic standard of service statewide.
- **OWDI 04-2019 Assessments:** To provide guidance on the assessment practices that are to be utilized by the Oklahoma Works one-stop centers in the assessments of WIOA participants.
- **OWDI 03-2019 Individual Employment Plan:** To communicate Oklahoma's processes and procedures for the development of an Individualized Employment Plan (IEP) for each individual determined to be eligible for Title I Adult and Dislocated Worker programs. This policy establishes the minimum standards for procedures to be developed and adopted by each local workforce development area.
- **OWDI 01-2019 Center Certification Policy:** To communicate Oklahoma's process and procedures for evaluating and certifying comprehensive and affiliate Oklahoma Works - A Proud Partner of the American Job Center Network (One-Stop) Centers.
- **OWDI 05-2017, Change 1 Local Board Certification Change 1:** To provide guidance and process for the Local Workforce Development Board two-year certification process.
- **OWDI 01-2017, Change 1 Regional and Local Planning Instructions Change 1:** To communicate Oklahoma's instruction for the local and regional plans under the Workforce Innovation and Opportunity Act.
- **OWDI 02-2019 Oklahoma Data Validation and Source Documentation Requirements:** To provide guidance to the workforce system on the State of Oklahoma's Data Validation and Source Documentation Requirements for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III.
- **OWDI 23-2017, Change 1 Conflict of Interest Change 1:** To provide guidance to the workforce system to ensure that WIOA Title I workforce development activities are conducted in a manner to prevent conflict of interest.
- **OWDI 09-2018 WIOA Title I Formula Programs and Job Corps Coordination:** To provide guidance to allow coordination between WIOA Title I formula fund program operators in the State's three workforce development areas where Job Corps centers are physically located.
- **OWDI 08-2017, Change 2 Oklahoma Data Integrity and Secure Stewardship of Personally Identifiable Information (PII):** To communicate Oklahoma's guidelines under which Local Workforce Development Boards (LWDBs) must develop and implement procedures for the oversight, monitoring, and review of participant data entered in OKJobMatch.



- **OWDI 07-2018 Supplemental Information Collection:** To provide guidance for the use of supplemental information within the Oklahoma Works workforce development system for the Chief Local Elected Officials (CLEOs) and the Local Workforce Development Boards (LWDBs) in carrying out the performance accountability requirements under WIOA section 116.
- **OWDI 06-2018 Effectiveness in Serving Employers:** To provide guidance for the Effectiveness in Serving Employers requirements within the Oklahoma works workforce development system for the Chief Local Elected Officials (CLEOs) and the Local Workforce Development Boards (LWDBs) in carrying out the performance accountability requirements under WIOA section 116.
- **OWDI 19-2017, Change 1 Adult Dislocated Worker Programs Change 1:** To clarify the coordination of training funds from other grant sources, including Federal Pell grants and other types of grant assistance for education and training services. Clarifications have also been made to the definition of Dislocated Worker Category I; to the Individual Employment Plan section regarding the documentation of case management activities; and to the determination of “unmet need”. Finally, information has been added regarding the inability to utilize WIOA funds to pay for the cost of training for individuals who have a Federal Student Loan in default status.
- **OWDI 16-2017, Change 1 Grievance and Complaint Process Change 1:** To communicate Oklahoma’s instructions for the grievance and complaint process under WIOA.
- **OWDI 04-2018 Worksite Agreement:** To update the Worksite Agreement from WIA to WIOA; provide a standardized three part Worksite agreement; and allow for the use of an alternative worksite time and attendance report, if applicable.
- **OWDI 03-2018 Roles and Responsibilities:** To communicate the roles and responsibilities of various entities created as a result of the Workforce Innovation and Opportunity Act.
- **OWDI 13-2017, Change 2 Nondiscrimination EO Policy Change 2:** To communicate Oklahoma’s process and procedures regarding nondiscrimination and equal opportunity procedures.
- **OWDI 24-2017, Change 1 Infrastructure Funding Agreements State Funding Mechanism Change 1:** To provide guidance on the operating costs of the one-stop delivery system, which are comprised of infrastructure costs and additional costs. Change 1 includes the addition of Attachment I.
- **OWDI 22-2017 Transitional Jobs:** To provide guidance to the workforce system on developing Transitional Jobs as a workforce strategy within the title I Adult and Dislocated Worker programs.
- **OWDI 20-2017 Oklahoma Works Branding:** To communicate Oklahoma’s common identifier, Oklahoma Works a Proud Partner of the American Job Center Network, and provide guidance on the usage of the Oklahoma Works a Proud Partner of the American Job Center Network brand as part of all external communications.
- **OWDI 18-2017 Negotiation Performance Goals:** To provide Local Workforce Boards the State of Oklahoma’s Performance Negotiation process for the WIOA Title I Programs and the Wagner-Peyser Employment Services as amended by Title III.

- **OWDI 02-2016, Change 2 WIOA Title I Youth Program Guidance Change 2:** To communicate State youth policy and provide WIOA Title I youth formula program technical guidance on the activities associated with the implementation of WIOA.
- **OWDI 17-2017 Limited English Language Proficiency:** To communicate Oklahoma's process and procedures regarding the prohibition against national origin discrimination as it affects persons with Limited English Proficiency (LEP).
- **OWDI 15-2017 Eligible Training Provider List:** To communicate Oklahoma's process and procedures regarding the Eligible Training Provider List (ETPL) and the eligibility of training providers to receive WIOA funds for the provision of training services to adults, dislocated workers, and out-of-school youth aged 16-24.
- **OWDI 11-2017 Governor's Oversight & Monitoring Plan:** To communicate the Governor's instructions for developing and implementing an Oversight and Monitoring plan for recipients of federally-funded programs and grants administered by the Oklahoma Office of Workforce Development. This issuance also details the Governor's standards for local oversight and monitoring.
- **OWDI 10-2017 Fiscal, Procurement, and Contracting Policy:** To communicate the State policy concerning fiscal requirements, procurement, and contracting.
- **OWDI 06-2017 MOU Policy:** To provide guidance for the local development and execution of Phase I of a Memorandum of Understanding (MOU) with all of the required partners.
- **OWDI 03-2017 Oklahoma Works One-Stop Operator Procurement Instructions:** To communicate Oklahoma's guidance for the procurement and selection of the local Oklahoma works One-Stop Operator under the Workforce Innovation and Opportunity Act.
- **OWDI 02-2017 Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board:** To provide guidance for local workforce development boards intending to redesignate within a region, consolidate, and/or become a new workforce area under WIOA.
- **OWDI 07-2016 Transfer of Formula Funds Policy:** To provide staff with specific policy, procedures, and guidelines for the transfer of funds between the Title I Adult and Dislocated Worker Programs of the Workforce Innovation and Opportunity Act.
- **OWDI 04-2016 Local Elected Official (LEO) Consortium Agreement:** To provide guidance relating to the LEO Consortium Agreement to ensure the necessary regulatory and operational elements are described, included, and understood.
- **OWDI 01-2016 Oklahoma Governor's Council for Workforce and Economic Development Policy Issuance Process:** To provide a process whereby parties in the workforce development delivery system can have a voice in the issuances of policy and monitoring.
- **OWDI 07-2015 Process for Identification of Workforce Planning Regions:** To provide guidance and process for the identification of Workforce Planning Regions in Oklahoma.
- **OWDI 06-2015 Process for Existing Local Workforce Development Area Conditional Designation:** To provide guidance to current and local workforce areas that did not meet the qualifications for initial designation.
- **OWDI 04-2015 Workforce Innovation and Opportunity Act (WIOA) Youth Program:** To provide staff with guidance on the changes to expenditure requirements,

eligibility and program elements under WIOA to the Title I Youth Programs. This policy defines the criteria for the design and parameters of the Title I Youth Program with emphasis on priority of service to out of school youth.

- **OWDI 02-2015 Local Area Initial Designation:** To provide guidance and process for the initial designation of Workforce Development Areas in Oklahoma, along with the process for appealing designation decisions.

## **State guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery**

OWDI 24-2017 and OWDI 24-2017, Change 1 provide local boards, chief elected officials and one-stop partners with guidance on determining equitable and stable methods of funding infrastructure in accordance with WIOA Sec. 121. OWDI 24-2017, Change 1 provides:

- Definitions for terms and practices commonly associated with infrastructure agreements;
- A description of the differences between one-stop operating costs specific infrastructure costs;
- A list of the required one-stop partners with agency or entity information specific to Oklahoma;
- Options for allocation methodologies;
- The required aspects of the Infrastructure Funding Agreement;
- The differences between the Local Funding Mechanism (LFM) and the State Funding Mechanism (SFM) as well as the potential impacts of using either mechanism;
- Procedures the state will follow if one or more WDAs requires the SFM including, and;
- Several tools to be used by local boards, chief elected officials, and local one-stop partners while negotiating Infrastructure Funding Agreements using the LFM.

In addition to issuing OWDI 24-2017, Change 1, OOWD held multiple meetings for one-stop partners, made staff available for meetings held in the local areas as requested, shared an ongoing document containing frequently asked questions, and held bi-weekly or weekly phone calls. As a best practice, OOWD continues to hold bi-weekly calls with local boards and one-stop partners as all parties strive to continue improving the system.

## **Title III**

OKJobMatch is an integrated, vendor hosted system supporting labor exchange for employers and job seekers, case management for program requirements, training providers and approved programs, reporting capability for all required federal, system and activity reports, and some interface with Unemployment Insurance. The system consists of components with appropriate features depending on the user.

**JobLink** is a self-service job matching and workplace information service for employers and job seekers. Job seekers can establish an internet account to manage their job search activities and register with the Employment Service to receive basic and individualized career services. Job seekers can create a robust resume and Unemployment Insurance claimants can register for work. Employers can establish an account to manage job openings and view job seeker

resumes and if requested, staff will assist employers with account creation and development of job orders.

**ServiceLink** is a client management application that allows case managers to track their caseload and report information required under Labor Exchange, Reemployment Services, WIOA, TAA (TRA Adjustment Act) and other federal programs. The application provides a standardized process for following participants through the workforce development system network. It eases the load for case managers by providing a tool that can manage and monitor caseloads, assess employment barriers, establish training and employment plans, search for service providers and WIOA eligible training providers and programs, and track job placements. ServiceLink collects all information required to generate reports for these federal programs.

**FiscalLink** allows case managers and program administrator the ability to process participant and vendor payments for all WIOA programs including NEG (National Emergency Grants), and TAA activities.

**ReportLink** is a web-enabled federal reporting data management system providing WIOA, TAA, Labor Exchange and WISPR reports.

### **3. State Program and State Board Overview**

#### **A. State Agency Organization**

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

The Oklahoma Office of Workforce Development (OOWD), housed at Oklahoma Department of Commerce (ODOC), guides the workforce development system in Oklahoma. There are four core programs in Oklahoma. The OOWD/ODOC serves as the Governor's grant recipient and administrative entity for Oklahoma's WIOA Title I programs: Adult, Dislocated Worker, and Youth. They also manage various discretionary grants and National Emergency Grants (NEG) that have been awarded. Wagner-Peyser is administered by the Oklahoma Employment and Security Commission (OESC). Vocational Rehabilitation is administered by the Oklahoma Department of Rehabilitation Services (DRS), and Adult Education and Family Literacy is administered by the Oklahoma Department of Career and Technology Education (ODCTE).

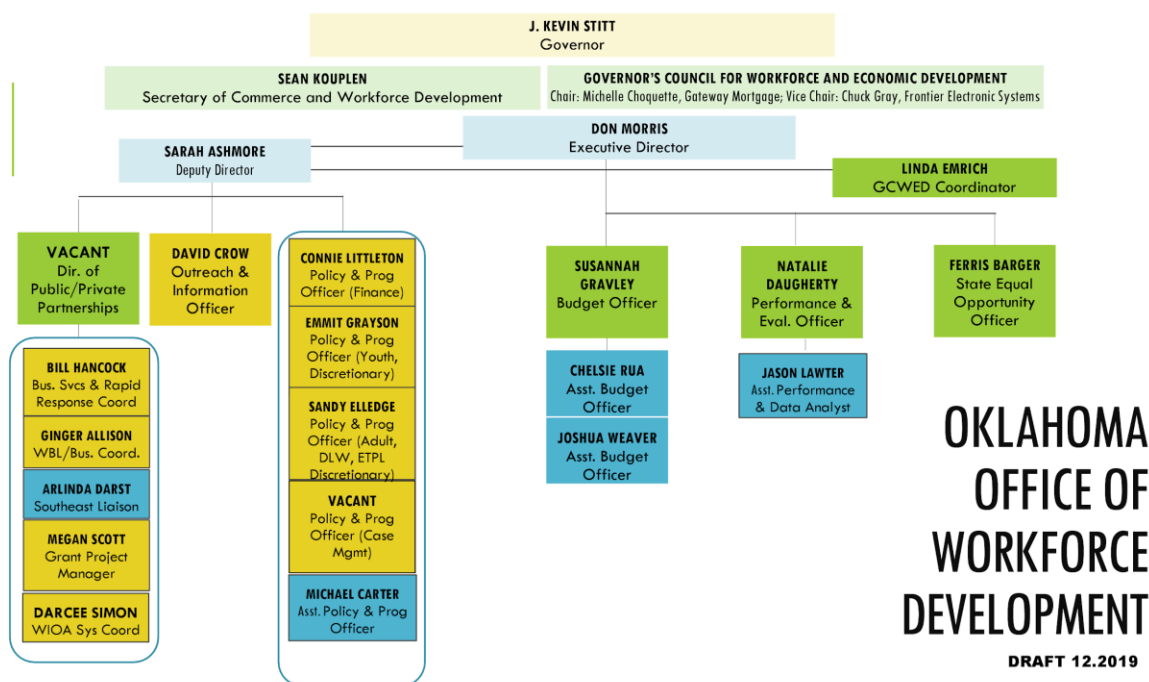
These core partners work closely together as well as with the State Workforce Development Board - referred to in Oklahoma as the Governor's Council for Workforce and Economic Development (GCWED). The GCWED advises the Governor on workforce priorities and initiatives while also overseeing workforce activities across the state and assisting in the development and implementation of the WIOA State Plan.

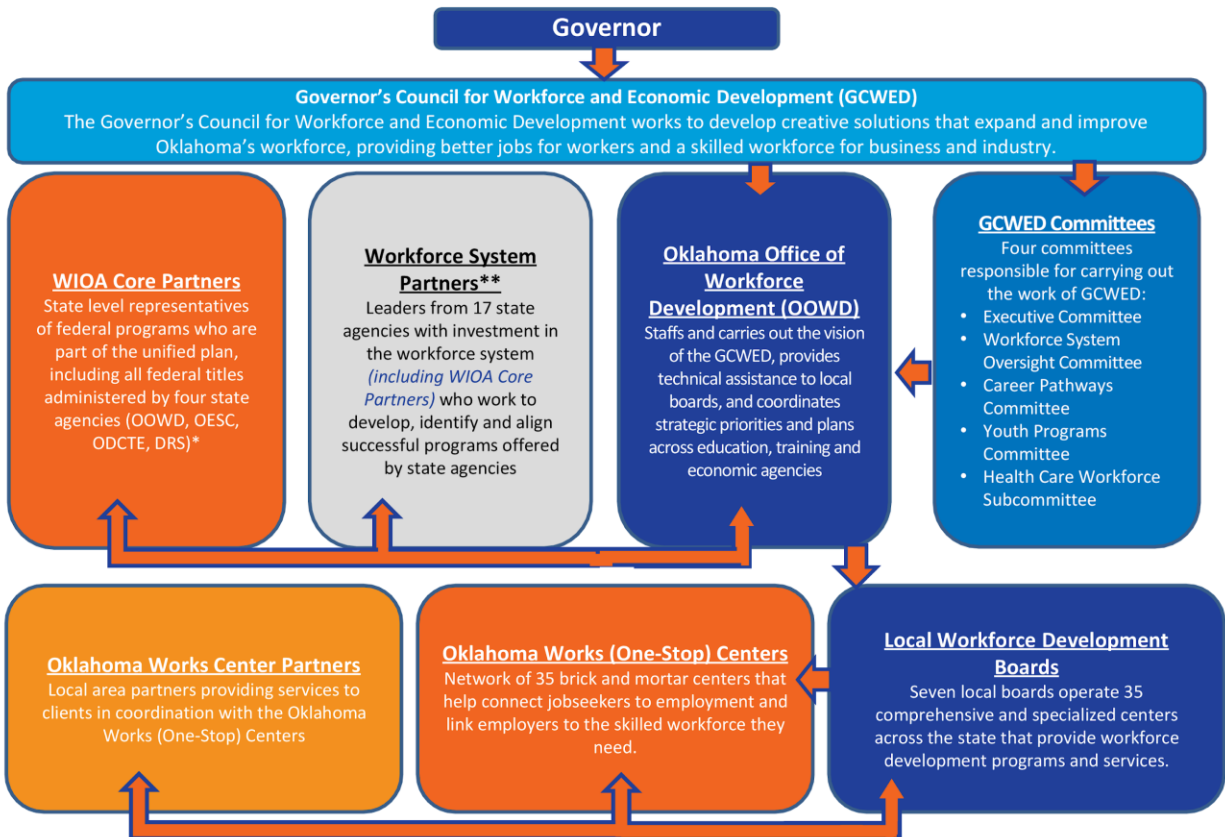
The Oklahoma Office of Workforce Development provides staffing support for the Governor's Council and its committees, provides technical assistance to four planning regions and seven

local workforce development boards, and monitors their activities. It is responsible for workforce system planning and policy, and partner and resource development. It coordinates workforce system projects and provides strategic guidance to Local Workforce Development Boards. The office also coordinates Rapid Response activities for the state.

The OOWD is under the direction of the Governor and the Cabinet Secretary of Commerce and Workforce Development. An Executive Director directs the office in the day-to-day operations.

The OOWD focuses Oklahoma's workforce development system on creating the innovation needed to create and retain jobs, to raise the education and skill levels of its citizens, and to connect employers with the workforce they need. Oklahoma's ultimate goal is a comprehensive workforce development system that is fully integrated and accountable. The OOWD facilitates the collaborative process of creating and implementing a systems approach to workforce development that serves business and creates employment opportunities for all Oklahomans.



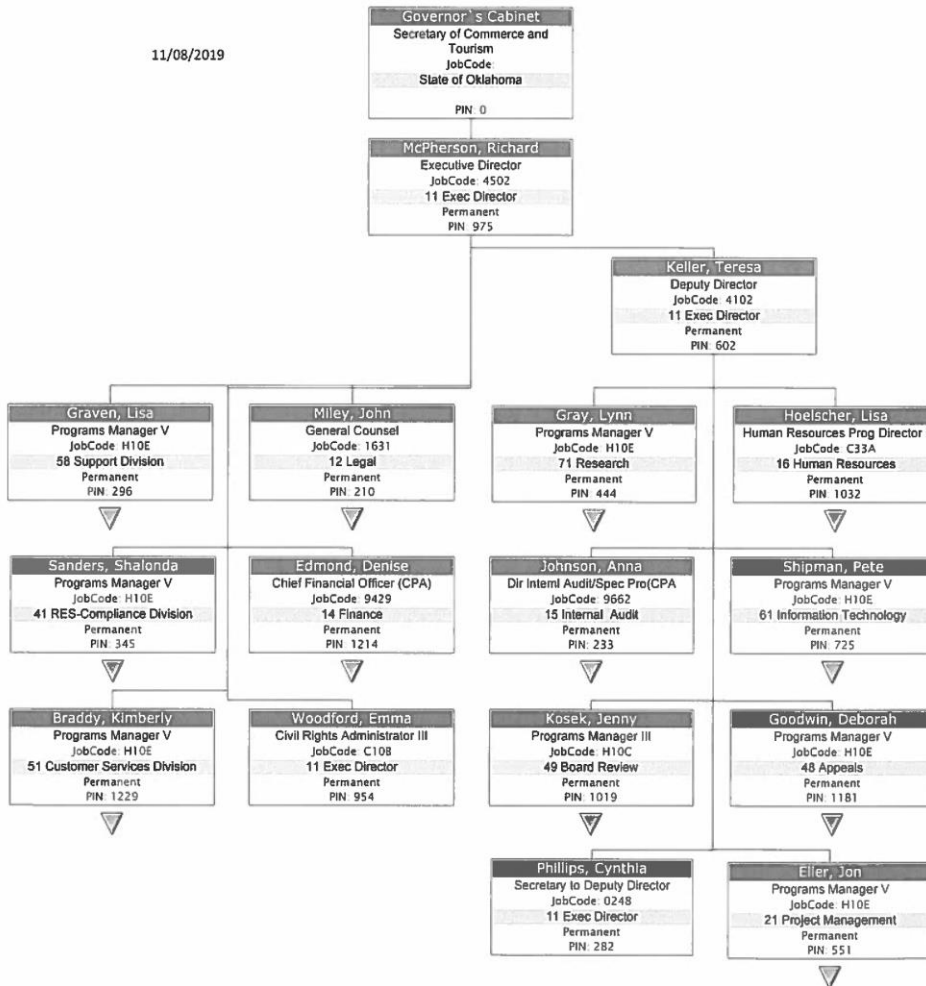


\*Oklahoma Employment Security Commission (OESC), Oklahoma Department of Career and Technology Education (ODCTE), Oklahoma Department of Rehabilitation Services (DRS)  
 \*\*See complete list of agencies in following table



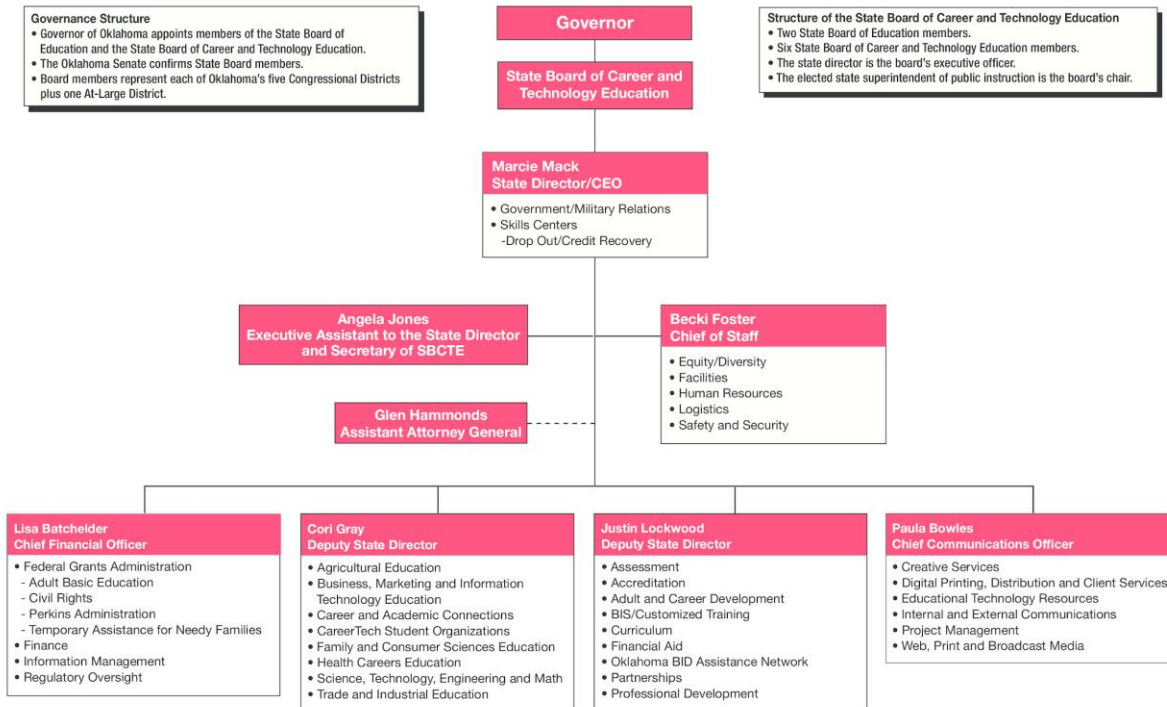
# Oklahoma Employment Security Commission

11/08/2019

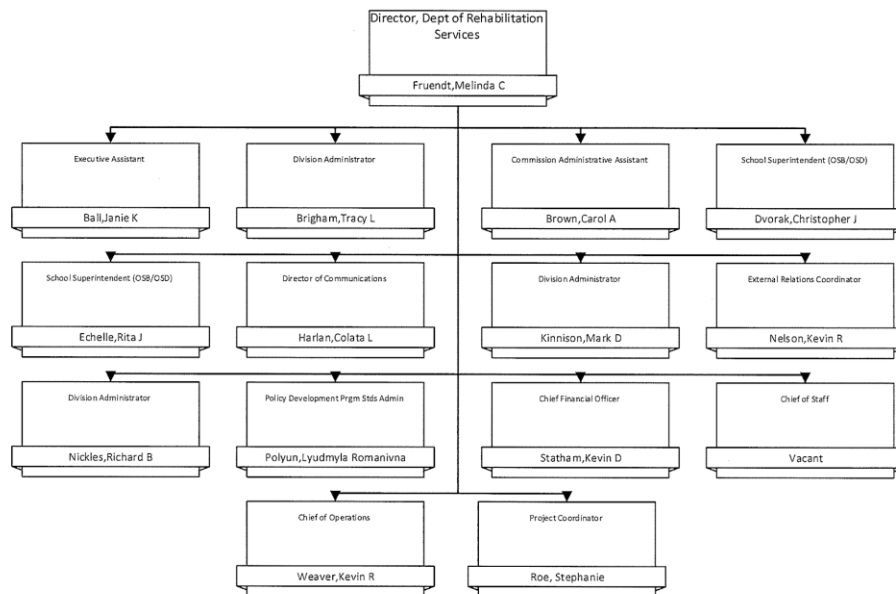


# OKLAHOMA DEPARTMENT OF CAREER AND TECHNOLOGY EDUCATION

## ORGANIZATIONAL CHART







OKLAHOMA DEPARTMENT OF  
REHABILITATION SERVICES

## B. State Board

Provide a description of the State Board, including -

### i. Membership roster

Provide a membership roster for the State Board, including members' organizational affiliations.

COUNCIL MEMBER	TITLE	REPRESENTING
Altshuler, Katie	Government & Community Relations Lead	Marathon Oil Company
Billy, Lisa Johnson	Secretary of Native American Affairs	Tribal (Chickasaw Nation)

<b>Cameron, Stephanie Vickers</b>	<b>Community Relations Administrator</b>	<b>AAON</b>
<b>Choquette, Michelle, Chair</b>	<b>Chief Human Resource Officer</b>	<b>Gateway First Bank</b>
<b>Curry, Jimmy</b>	<b>President</b>	<b>AFL-CIO</b>
<b>DeLozier, Dan</b>	<b>Rogers County Commissioner, Dist. #1</b>	<b>Rogers County</b>
<b>Donica, Gayle</b>	<b>Director, Human Resources</b>	<b>Noble Research Institute</b>
<b>Fruendt, Melinda</b>	<b>Executive Director</b>	<b>OK Dept. of Rehabilitation Services</b>
<b>Gray, Chuck, Vice Chair</b>	<b>President &amp; CEO</b>	<b>Frontier Electronic Systems Corp.</b>
<b>Hager, Geoffrey</b>	<b>CEO</b>	<b>Big Elk Energy Systems</b>
<b>Haworth, Scott</b>	<b>Site Director</b>	<b>DellEMC</b>
<b>Hays, Dee</b>	<b>President &amp; CEO</b>	<b>Excellence Engineering, LLC</b>
<b>Hodgen, Gregory</b>	<b>President &amp; CEO</b>	<b>Groendyke Transport Inc.</b>
<b>Huggins, Teresa</b>	<b>CEO</b>	<b>Stigler Health and Wellness Center, Inc.</b>
<b>Kouplen, Sean</b>	<b>Secretary of Commerce &amp; Workforce Development</b>	<b>OK Dept. of Commerce &amp; Workforce Development</b>
<b>Lakin, Phil</b>	<b>Tulsa City Councilor, Dist. 8</b>	<b>Local Elected Official/CEO Tulsa Community Foundation</b>
<b>Mack, Marcie</b>	<b>State Director</b>	<b>OK Dept. of Career &amp; Technology Education</b>
<b>Mariska, Chad</b>	<b>Chairman, President &amp; CEO</b>	<b>APS FireCo</b>
<b>McPherson, Richard</b>	<b>Executive Director</b>	<b>OK Employment Security Commission</b>

<b>O'Donnell, Tommy</b>	<b>Training Director</b>	<b>Plumbers and Pipefitters Training Center</b>
<b>Robinson, Ben</b>	<b>Secretary of Veterans Affairs</b>	<b>Veterans</b>
<b>Seals, Riley</b>	<b>Sr. Director of Distribution</b>	<b>Dollar General Corporation</b>
<b>Shepelwich, Steven</b>	<b>Senior Community Affairs Adv.</b>	<b>Federal Reserve Bank of KC-OKC Branch</b>
<b>Simmons, Jodi</b>	<b>Chief Nursing Officer (CNO)</b>	<b>Hillcrest Medical Center</b>
<b>Stewart, David</b>	<b>Administrator</b>	<b>Oklahoma Ordnance Works Authority (MidAmerica Industrial Park)</b>
<b>Thomas, Jason</b>	<b>Human Resources Manager</b>	<b>Boeing Company</b>
<b>Thompson, Valerie</b>	<b>Director</b>	<b>Urban League of Greater Oklahoma City, Inc.</b>
<b>Viklund, Pat</b>	<b>OKC Metro Area Director</b>	<b>Center for Employment Opportunities</b>
<b>Wilcox, Dewayne</b>	<b>Bus. Mgr./Financial Secretary</b>	<b>IBEW Local 1141 (1700 SE 15th ST., OKC)</b>
<b>Williams, Marty</b>	<b>Owner/Manager</b>	<b>Williams Farms</b>

\*Oklahoma Legislators are not included on the Governor's Council, as it is not allowable by Oklahoma Statute.

Oklahoma brings together leaders from business, government, education, and non-profit sectors to jointly develop ways to coordinate workforce development with economic development. This is done through Oklahoma's State Workforce Development Board, which is called the Governor's Council for Workforce and Economic Development (GCWED). The GCWED works to develop creative solutions that expand and improve Oklahoma's workforce, providing better jobs for workers and a skilled workforce for business and industry.

The interrelation of agencies within Oklahoma's workforce system starts with the Governor's Council for Workforce and Economic Development. The Governor's Council serves as Oklahoma's lead workforce development entity and its statewide Workforce Innovation and Opportunity Board. The Governor, in accordance with Section 101 of the Workforce Innovation and Opportunity Act, established the State Council as an advisory body to the Governor, and the body was codified by the Oklahoma Legislature in 2006 (WIA) and in 2015 (WIOA).

The Governor's Council includes private and public sector individuals from all areas of the state that work together to support the governor's economic and workforce development vision, Oklahoma Works. It is business-led with a majority of the members coming from private sector employers with optimum policymaking or hiring authority.

The Governor's Council meets quarterly; however, interaction between its members occurs on a regular basis. Initiatives that involve long-standing partnerships between private companies and public agencies are ongoing.

The governor appoints private sector representatives from Oklahoma's Industry Clusters. These Industry Clusters include high-growth, high-demand industries and occupations statewide. There are five main Industry Clusters for the state of Oklahoma: aerospace and defense; energy; agriculture and biosciences; information and financial services; and transportation and distribution.

The governor establishes terms of appointment or other conditions governing appointment or membership on the council. Members are appointed for staggered terms. Members continue to serve until a replacement is appointed by the Office of the Governor. If vacancies occur during a term of office, the Office of the Governor makes new appointments for the duration of the term. All initial terms of office start on November 1 after receiving notification by letter from the Office of the Governor specifying an explanation of the term structure.

Private and public sector representatives also serve on Governor's Council committees charged with developing and recommending initiatives to enhance and implement Oklahoma's workforce and economic development strategy. Those committees are: Executive Committee, Workforce System Oversight Committee, Youth Program Committee, Career Pathways Committee, and Healthcare Workforce Committee. Recommendations are taken to the full Council for action.

## **Leadership**

The chair (appointed by the Governor) of the Governor's Council was Nathaniel Harding, Founder and President of Antioch Energy, Oklahoma City, OK. Nathaniel served as chair from January 2017 until December 2019. In December 2019, the new governor of Oklahoma then appointed Michelle Choquette, Human Resources Director at Gateway First Bank, Jenks, OK, as chair of the Governor's Council.

Another leadership change took place in February 2019. The new governor of Oklahoma appointed Sean Kouplen Secretary of Commerce and Workforce Development. The Oklahoma Office of Workforce Development came under his leadership at that time.

The Governor's Council is staffed by the Oklahoma Office of Workforce Development (OOWD). OOWD also staffs the Executive Committee, the Workforce System Oversight Committee, the Career Pathways Committee, and the Youth Programs Committee. The Department of Health and OOWD staff the Healthcare Workforce Committee.

## **Governor's Council Standing Committees**

Executive Committee

Purpose according to the Governor's Council Bylaws: The Executive Committee shall act in place of the Governor's Council only when necessary and with subsequent full board review, action, and ratification. It shall convey to the Governor recommendations posed by the Council, approve the direction of the Strategic Plan, develop the areas for tasks required for committees as warranted, appoint committee composition (Council members and at-large community members) and co-chairs, respond to the needs of the Council and its members, conduct an annual review of the Executive Director, and make staff capacity recommendations.

The Executive Committee is comprised of business members of the Council, including at minimum: the Chair, Vice-Chair, and the Co-Chair (private sector representative) from each of the Council's committees, excluding those who are non-members of the Council.

### Workforce System Oversight Committee

Purpose according to the Governor's Council Bylaws: Makes decisions on program governance, policy and capacity building for the Local Workforce Development Boards and partnerships. The Committee serves as an oversight board and will ensure compliance with WIOA.

#### Goals/Objectives

- Certify Workforce Development Boards in compliance with the Workforce Innovation and Opportunity Act (WIOA).
- Continue designing, aligning and integrating Oklahoma's workforce/talent development and delivery system.
- Set system-wide metrics and performance expectations.
- Identify and conduct service delivery efficiency pilot projects.
- Research and identify operational and organizational strategies that will help make workforce boards stronger and service delivery better.
- Develop guidance to make the workforce system more effective and efficient.
- Development of the State Plan, Council Strategic Plan, and the Annual Report.
- Work with regional planning areas to develop planning documents.

#### Action Items

- Coordinate and ensure support at the local and state level to the state vision.
- Through a partner supported subcommittee, provide guidance in the form of policy and technical assistance to ensure compliance to WIOA local areas and designated local planning regions, to ensure statewide metrics and required performance are met.
- Convene statewide workforce development partners and local workforce development boards and provide venues and opportunities for continued system building.
- Support and facilitation for pilot projects to provide models for the statewide system
- Plan and develop statewide summits for the Local Elected Officials and board members to continue regional planning.

### Youth Program Committee

Purpose according to the Governor's Council Bylaws: Provide recommendations on policy and performance for the development and implementation of WIOA youth funded programs

statewide. Create an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state's economic goals.

#### Goals/Objectives

- Oklahomans are aware and supportive of the state's emerging workforce and the effect of current trends and issues.
- A youth system is developed through a collaborative effort of networking that is inclusive of all state and local youth organizations.
- The progress and impact of the youth system is benchmarked, measured, and rewarded and best practices reported.

#### Action Items

- Work with the education system to support the prevention and recovery of affected youth.
- Develop prevention and recovery strategies for both in-school and out-of-school youth.
- Develop a statewide plan in support of youth which would include a communication infrastructure that will inform and engage all stakeholders.
- Provide guidance to assist local areas in achieving compliance.

#### Healthcare Workforce Committee

Purpose according to the Governor's Council Bylaws and Oklahoma Statute: Inform, coordinate and facilitate statewide efforts to ensure that a well-trained, adequately distributed, and flexible healthcare workforce is available to meet the needs of an efficient and effective healthcare system in Oklahoma.

#### Goals/Objectives

- Statewide health workforce efforts are being coordinated through a single, centralized entity.
- Labor demand and program supply for 20 critical healthcare occupations are identified and quantified through the development of a longitudinal, multi-sourced data set that is available for public use.
- Strategies are in place to reduce identified supply gaps for 20 critical health occupations.
- At least five recommended policies and programs that support and retain an optimized health workforce have been implemented

#### Action Items

- Conduct data analysis and prepare reports on health workforce supply and demand;
- Research and analysis of state health professional education and training capacity;
- Recommend recruitment and retention strategies for areas determined by the Oklahoma Primary Care Office or the Oklahoma Office of Rural Health to be areas of high need; and
- Assessment of health workforce policy, evaluation of impact on Oklahoma's health system and health outcomes, and developing health workforce policy recommendations.

#### Career Pathways Committee

Purpose according to the Governor's Council Bylaws: Make recommendations, inform, coordinate and facilitate statewide efforts to improve Oklahomans' exposure to high-demand career and entrepreneurship opportunities, along with the education and training required for entry into and advancement within a chosen career. Develop industry sector strategies in state and regional ecosystems to ensure that the education and training system is delivering the skills needed by employers.

#### Goals/Objectives

- Create a plan for Career Pathways efforts to be based on industry sectors within Oklahoma's state and regional ecosystems.
- Establish strategies to support the use of career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities) with workforce development activities, education, and supportive services to enter or retain employment.
- Increase high school graduation rates - decrease high school dropout rates.
- Increase the percentage of Oklahoma workers with a recognized postsecondary credential. (A credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State or Federal government, or an associate or baccalaureate degree.
- Use performance data to demonstrate progress and impact.
- Develop or research pilots and models.

#### Action Items

- Expand sector partnerships within each Local Workforce Area
- Work with education and training partners to adopt or align curriculum in programs to meet employers' needs.
- Explore and promote Registered Apprenticeship and other work-based learning opportunities.
- Explore promising strategies that have been working for others and might be easily replicable.

## **ii. Board Activities**

Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.

Oklahoma brings together leaders from business, government, education, and non-profit sectors to jointly develop ways to coordinate workforce development with economic development.

The Governor's Council for Workforce and Economic Development works to develop creative solutions that expand and improve Oklahoma's workforce, providing better jobs for workers and a skilled workforce for business and industry.

The Governor's Council operates in accordance with the functions contained in Section 101(d) of the WIOA to oversee Oklahoma's workforce development system. The Governor's Council advises the governor on the creation, implementation, and continuous improvement of a comprehensive statewide workforce development system in support of economic development.

The Governor's Council assists the governor in the preparation of the state plan by assigning staff from various entities represented on the council to collaborate on the initiatives included and the writing of the plan.

The Governor's Council develops linkages through its members and workforce system partners. This regular contact among the partners allows for constant collaboration on issues.

The Governor's Council Workforce System and Oversight Committee will review local and regional plans submitted from each of Oklahoma's workforce development areas and regions. This review ensures that the local and regional plans align with the state plan and that these plans are demand-driven with significant input from identified local industry representatives. The council provides technical assistance to local areas and regions in the development of their plans, if needed.

The Governor's Council also recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, WDBs, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

The Council is responsible for certifying Local Workforce Boards. The certification process is the key strategy to ensure Local Workforce Development Boards have the proper membership and structure to be highly effective in creating and continuously improving an aligned workforce development system, overseeing funds effectively and achieving established performance measures.

As also described in the Plan, the Governor's Council was instrumental in making recommendations regarding the assignment of local workforce areas to regions. This process was an open process including input from local boards, local elected officials and stakeholders prior to the creation of the four Oklahoma Regional Workforce Planning Regions.

Allocation formulas for the distribution of funds for adult, dislocated worker and youth programs under WIOA are developed as per the federal WIOA law.

## **4. Assessment and Evaluation of Programs and One-Stop Program Partners**

### **A. Assessment of Core Programs**

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

A consideration for each of the core programs will be the delivery of quality, customer service oriented, and effective programs driven by continuous improvement principles.

Once the baselines for all of the core programs has been determined with the US Departments of Labor and Education, each of the core programs whether state or locally based will be expected



to invest their program funds in a manner that both meets the intent of their funding streams and targets the required performance.

## **B. Assessment of One-Stop Program Partner Programs**

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

The State will continue to develop standard data gathering across core programs to determine the structure of joint reports in the future, calling on the expertise of core entities. The state and local areas will be assessed based on a comparison of the actual performance level with the adjusted level of performance annually. The regional Memorandums of Understanding that are negotiated with each partner will further detail locally-identified requirements for integrated service delivery. Each region will create a plan to measure agreed upon success factors, which will include continuous improvement strategies to ensure high quality customer service at the Oklahoma Works American Job Centers. Currently, the state is exploring additional state-level criterion to assess the effectiveness of partnerships and outcomes.

## **C. Previous Assessment Results**

Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the State is adapting its strategies based on these assessments.

The State will be assessing programs against negotiated performance on a quarterly and annual basis. In negotiating new levels, the state will look at how well core partners did on the previously negotiated measures. For those performance indicators, where there is insufficient data available on which to build the required statistical adjustment model and consequently, to establish levels of performance, Oklahoma will continue to use a “Phased in” approach to set levels of performance for the “baseline” indicators determined by the Departments. “Baseline” indicators have been and will continue to be collected and evaluated to determine ongoing strategies for the assessment of effectiveness of the core programs and other one-stop partner programs included in Oklahoma’s State Plan. For programs that meet or exceed performance the state will evaluate the economy and performance of the planning region or local area as appropriate. For areas where they have been barely meeting performance, the state will examine whether the area is in need of technical assistance, has implemented best practices or should be under a corrective action plan with respect to their performance. As appropriate, the state will communicate with the appropriate elected official.

## **D. Evaluation**

Describe how the State will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Under the authority of the GCWED, OOWD will conduct research and evaluation projects in conjunction with representatives of WIOA partners, local workforce development boards, service providers, program participants, impacted advocacy and interest groups, as well as the public. Rigorous, academic-based methodologies will be applied using, as appropriate, current and historical programmatic data, formal literature reviews of existing research on pertinent topics, and information gathered through research tools such as surveys, focus groups, interviews, and meetings. Findings will be shared with appropriate DOL representatives, partners, research participants and, if appropriate, the public via OOWD's website.

In November 2019, Oklahoma applied for the USDOL Evaluation Peer Learning Cohort called The Evaluation Peer Learning Cohort (EvalPLC). In December 2019 Oklahoma was among 5 other states to participate in this interactive technical assistance forum. Oklahoma's State team is comprised of cross-agency representatives who represent core WIOA programs. One of the goals of Oklahoma's EvalPLC participation is to develop both state and local evaluation plans.

## **5. Distribution of Funds for Core Programs**

Describe the methods and factors the State will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

### **A. For Title I programs**

For Title I programs, provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

#### **i. Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),**

In accordance with WIOA Section 128 (b)(3), the State of Oklahoma uses a discretionary allocation formula to successfully distribute funding for WIOA Title I Youth activities. Using the flexibility prescribed in WIOA enables the state to distribute funding based on required economic data as well as economic data specific to Oklahoma including historically low unemployment rates, regional variations, as well as barriers unique to Oklahoma's workforce.

Upon receipt of the federal Notice of Award (NOA), OOWD calculates an 85% minimum amount of the state's total youth allocation to distribute to the designated local Workforce Development Areas (WDAs) in Oklahoma. The following factors and weighted values determine the amount of funding to be awarded to each area for Title I Youth Activities:

- **Areas of Substantial Unemployment – 23.333%**

An Area of Substantial Unemployment (ASU), as defined by WIOA and the Bureau of Labor Statistics is a contiguous geographic area sufficient enough in size and scope to sustain a program of workforce investment activities, with a population of at least 10,000 and an unemployment rate of at least 6.5%. Oklahoma uses county level data to determine ASUs in Oklahoma.

The number of unemployed individuals with an ASU is summed and weighted calculating the appropriate dollar amount each ASU is to receive. A county that does not meet the criteria for an ASU does not receive funding for this formula factor.

Data Source: Data used to calculate ASUs is sourced by the BLS, Local Area Unemployment Statistics and the United State Census Bureau.

- **Excess Unemployment – 23.333%**

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. Oklahoma uses county level data to determine excess unemployment in Oklahoma.

The number of unemployed individuals in excess of the calculated 4.5% in each county is divided by the total number of excess unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals does not receive funding for this formula factor.

Data Source: Data used to calculate Excess Unemployment is sourced by the BLS, Local Area Unemployment Statistics.

- **Disadvantaged Youth – 23.333%**

A Disadvantaged Youth is an individual aged 16 through 21 who received an income, or is a member of a family that received a total family income, that does not exceed the poverty line or 70 percent of the lower living standard income level. Oklahoma uses county level data to determine the number of Disadvantaged Youth in Oklahoma.

The number of disadvantaged youth in each county is divided by the total number of disadvantaged youth in Oklahoma calculating the appropriate dollar amount each county is to receive. A county that does not have any disadvantaged youth does not receive funding for this formula factor.

Data Source: Data used to calculate Disadvantaged Youth is sourced by the United State Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

- **Excess Youth Poverty – 30%**

The percentage of population for whom poverty status is determined in Oklahoma is historically higher than that of the United States. Due to the significant impact living in poverty has on families and individuals, distributing funds to geographic areas with excessive poverty ensure resources are made available to WDAs who workforce faces additional obstacles.

Excess Youth Poverty is the relative number of individuals, under the age of 18, living below the poverty level in a geographic area in which the percentage of population for whom poverty status is determined is greater than the state's percentage. Oklahoma uses county level data to determine the number of youth living in excess poverty.

The number of excess youth poverty in each eligible county is divided by the total number of excess poverty in all eligible counties across the state calculating the appropriate dollar amount each county is to receive. A county whose percentage of population for whom poverty status is determined less than or equal to the state's percentage does not receive any funding for the final formula factor.

Data Source: Data used to calculate Excess Youth Poverty is sourced by the United States Census Bureau.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county then by WDA.

In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensure award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty data. Additional information regarding the methodology for adjusting local area allocations in this fashion is available in OOWD Technical Assistance number TA-02-2016.

In the event the criteria for one or more formula factors prevents the state from distributing funding for said factor(s), an adjustment to the 90% methodology described above is made. Under these circumstances, each area under the 90% minimum's allocation will be raised to meet the minimum. The undistributed balance is then disbursed based on their current percentage of the calculated total.

## **ii. Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),**

In accordance with WIOA Section 128 (b)(3), the State of Oklahoma uses a discretionary allocation formula to successfully distribute funding for WIOA Title I Adult activities. Using the flexibility prescribed in WIOA enables the state to distribute funding based on required economic data as well as economic data specific to Oklahoma including historically low unemployment rates, regional variations, as well as barriers unique to Oklahoma's workforce.

Upon receipt of the federal NOA, OOWD calculates an 85% minimum amount of the state's total adult allocation to distribute to the designated local WDAs in Oklahoma. The following factors and weighted values determine the amount of funding to be awarded to each area for Title I Adult Activities:

- **Areas of Substantial Unemployment – 23.333%**

An ASU, as defined by WIOA and the Bureau of Labor Statistics is a contiguous geographic area sufficient enough in size and scope to sustain a program of workforce investment activities, with a population of at least 10,000 and an unemployment rate of at least 6.5%. Oklahoma uses county level data to determine ASUs in Oklahoma.

The number of unemployed individuals with an ASU is summed and weighted calculating the appropriate dollar amount each ASU is to receive. A county that does not meet the criteria for an ASU does not receive funding for this formula factor.

Data Source: Data used to calculate ASUs is sourced by the BLS, Local Area Unemployment Statistics and the United State Census Bureau.

- **Excess Unemployment – 23.333%**

Excess Unemployment is the number of unemployed individuals over 4.5% of the civilian labor force. Oklahoma uses county level data to determine excess unemployment in Oklahoma.

The number of unemployed individuals in excess of the calculated 4.5% in each county is divided by the total number of excess unemployed individuals calculating the appropriate dollar amount each county is to receive. A county that does not have an excess of unemployed individuals does not receive funding for this formula factor.

Data Source: Data used to calculate Excess Unemployment is sourced by the BLS, Local Area Unemployment Statistics.

- **Disadvantaged Adults – 23.333%**

A Disadvantaged Adult is an individual aged 22 through 72 who received an income, or is a member of a family that received a total family income, that does not exceed the poverty line or 70 percent of the lower living standard income level. Oklahoma uses county level data to determine the number of Disadvantaged Adults in Oklahoma.

The number of disadvantaged adults in each county is divided by the total number of disadvantaged adults in Oklahoma calculating the appropriate dollar amount each county is to receive. A county that does not have any disadvantaged adults does not receive funding for this formula factor.

Data Source: Data used to calculate Disadvantaged Adults is sourced by the United State Census Bureau as provided by the United States Department of Labor Employment & Training Administration.

- **Excess Adult Poverty – 30%**

The percentage of population for whom poverty status is determined in Oklahoma is historically higher than that of the United States. Due to the significant impact living in poverty has on families and individuals, distributing funds to geographic areas with excessive poverty ensure resources are made available to WDAs who workforce faces additional obstacles.

Excess Adult Poverty is the relative number of individuals, aged 18 to 64, living below the poverty level in a geographic area in which the percentage of population for whom poverty status is determined is greater than the state's percentage. Oklahoma uses county level data to determine the number of adults living in excess poverty.

The number of excess adult poverty in each eligible county is divided by the total number of excess poverty in all eligible counties across the state calculating the appropriate dollar amount each county is to receive. A county whose percentage of population for whom poverty status is determined less than or equal to the state's percentage does not receive any funding for the final formula factor.

Data Source: Data used to calculate Excess Adult Poverty is sourced by the United State Census Bureau.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county then by WDA.

In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensure award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty data. Additional information regarding the methodology for adjusting local area allocations in this fashion is available in OOWD Technical Assistance number TA-02-2016.

In the event the criteria for one or more formula factors prevents the state from distributing funding for said factor(s), an adjustment to the 90% methodology described above is made. Under these circumstances, each area under the 90% minimum's allocation will be raised to meet the minimum. The undistributed balance is then disbursed based on their current percentage of the calculated total.

**iii. Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.**

In accordance with WIOA Section 133(b)(2), Oklahoma uses a six factor formula to distribute funding for WIOA Title I Dislocated Worker activities. The formula factors use available data

that most accurately describes the economic status and need for dislocated worker funding across Oklahoma.

Upon receipt of the federal NOA, the OOWD calculates a 60% minimum amount of the state's total dislocated worker allocation to distribute to the designated local WDAs through the state. The following factors and weights values determine the amount of funding to be awarded to each area for Title I Dislocated Worker activities:

- **Unemployment Insurance – 25%**

Unemployment Insurance, as a formula factor, is an average of the number of allowed unemployment claims filed over a 12-month period in a geographic area. Oklahoma uses county level data to determine the number of allowed unemployment claims filed.

The average number of unemployment claims filed over a 12-month period in each county is divided by the total average number of unemployment claims filed over a 12-month period calculating the appropriate dollar amount each county is to receive.

Data Source: Data used to calculate Unemployment Insurance is sourced by the Oklahoma Employment Security Commission.

- **Long-Term Unemployment – 20%**

Long-term unemployment is the number of individuals who have been unemployed for 15 weeks or more in each county in relation to the number of individuals who have been unemployed for 15 weeks or more across the state. Oklahoma uses county level calculations to determine the number of long-term unemployment in Oklahoma.

The number of long-term unemployed individuals calculated for each county is divided by the total number of long-term unemployed individuals in the state determining the appropriate dollar amount each county is to receive.

Data Source: Data used to calculate Long-term Unemployment is sourced by the Bureau of Labor Statistics.

- **Unemployment Concentrations – 20%**

Unemployment Concentrations, as a formula factor, is the number of unemployed individuals in each county in relation to the number of unemployed individuals across the state, above the state's unemployment rate.

The number of unemployed individuals in each county with an unemployment rate above the state's is divided by the total number of individuals calculating the appropriate dollar amount each county is to receive.

Data Source: Data used to calculate Unemployment Concentrations is sourced by the Bureau of Labor Statistics, Local Area Unemployment Statistics.

- **Declining Industries – 15%**

Declining Industries data shows consistent job loss, within industry clusters, in a geographic region. Oklahoma uses county level data to calculate Declining Industries.

The number of jobs lost in each county is divided by the total number of jobs lost across the state calculating the appropriate dollar amount each county is to receive. A county that experience overall job growth, instead of loss, does not receive funding for this formula factor.

Data Source: Data used to calculate Declining Industries is sourced by the Oklahoma Employment Security Commission.

- **Farmer/Rancher Economic Hardship – 20%**

Farmer/Rancher Economic Hardship is an even split of two key agriculture economic indicators: Net Cash Farm Income and Hired Farm Labor. Oklahoma uses county level data to calculate Farmer/Rancher Economic Hardship.

Net Cash Farm Income, as a formula factor, is any negative change in income between the most current Census of Agriculture and the previous Census of Agriculture. The change in income for each county with a negative change is divided by the total negative change in the state to calculate the appropriate dollar amount each county is to receive.

Hired Farm Labor, as a formula factor, is any negative change in the number of hired farm workers between the most current Census of Agriculture and the previous Census of Agriculture. The change in works in each county with a negative change is divided by the total negative change in the state to calculate the appropriate dollar amount each county is to receive.

Data Source: Data used to calculate Farmer/Rancher Economic Hardship is sourced by the United States Department of Agriculture, Census of Agriculture.

- **Mass Layoff – 0%**

Mass layoff data is no longer available through the Bureau of Labor Statistics and the state does not track or report on this information. Therefore, the final formula factor is weighted at zero (0) and no funding is distributed for Mass Layoff data.

To calculate the initial formula allocation for each area, the dollar amount calculated for each factor is summed by county then by WDA.

In the event the initial formula allocation determines an area is to receive less than 90% of the average percent share of the previous two year's percent share, the amount needed to increase said area(s) to the 90% minimum will be ratably reduced from those areas whose initial formula allocation is higher than the 90% minimum award. This process ensure award amounts from year to year do not result in the often extreme fluctuations of unemployment, population, and poverty



data. Additional information regarding the methodology for adjusting local area allocations in this fashion is available in OOWD Technical Assistance number TA-02-2016.

Due to the differences and fluctuations in federal, state and local economic and unemployment situations the Governor will, if necessary, adjust the formula no more than once per program year to ensure that dislocated worker funding is awarded based on the most relevant circumstance and data in relation to the period of time for which the data is analyzed.

## **B. For Title II:**

### **i. Multi-year grants or contracts**

Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

### **Distribution of Funds for the Adult Basic Education Grant**

Oklahoma has grouped each of its 77 counties into four Oklahoma WIOA regions. These four Oklahoma WIOA regions are further divided into a total of seven Workforce Development Areas. The Oklahoma Department of Career and Technology Education (ODCTE) will group these 77 counties into Adult Basic Education (ABE) Service Areas to align with the seven workforce development areas.

Once these ABE service areas are determined, ODCTE staff will determine an allocation amount for each ABE service area by using demographic data for each of Oklahoma's 77 counties. This allocation for each ABE Service Area will include the number of eligible individuals within a service area. This will include eligible individuals 18-24 years of age and eligible individuals 25+ years of age that do not have a high school diploma or its recognized equivalent. A formula will then be determined using these variables to determine an allocation amount for each county. The amount for each county within an ABE service area will be totaled, and eligible providers will compete for up to this amount in their application. Multiple service providers may be selected within an ABE Service Area based on funding requested on dollars available. Eligible providers will determine a budget for providing services in the service area(s) requested and the ODCTE will evaluate these budgets. Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the eligible provider application, past performance including Measurable Skill Gain attainment relative to the state performance target, expected number of individuals to be served, workforce board recommendations, previous year allocation, past expenditures, and results from the pre-award risk assessment. A committee made up of Adult Basic Education personnel at the ODCTE will review these factors and based on this information and money available for each workforce area, determine the award amounts for each eligible provider receiving a grant. The ODCTE may decide to regrant all or portions of the state based on the quality of the applications and to ensure equitable access of service offerings to eligible individuals. If there are unrequested portions of funds in a service area, the ODCTE may elect to redistribute those funds to other areas of need in the state. The ODCTE may also choose to reopen a competition in the service area. Priority will be given to those areas in the same region of where the unrequested funds came from.

The amount received by eligible recipients will be held steady for not more than three years. After this period allocation amounts for each service provider will be determined using a formula that accounts for the eligible individuals in an ABE service area, performance of the service provider, and provider need.

## **ii. Ensure direct and equitable access**

Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

Eligible providers will apply for the Adult Basic Education Grant, IELCE Grant, and Corrections Education Grant directly to the Oklahoma Department of Career and Technology Education. Notification of the RFP will first take place on the ODCTE website. Subsequent notification may follow through electronic as well as other means to those parties potentially interested in applying for the grant. Core WIOA partners and one-stop partners will also be notified at the same time as the RFP is published on the website. The application will be available as a Microsoft Word document that can be downloaded from the ODCTE website. The completed application will be emailed to the ODCTE Adult Basic Education Division. Upon receiving the application, the Oklahoma State ABE Director will send a notification within 24 hours to the applicant that the ODCTE has received the application. Each applicant will fill out the same application and submit their application through the same means. This will ensure direct and equitable access to all eligible providers.

## **C. Title IV Vocational Rehabilitation**

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

The Oklahoma Department of Rehabilitation Services (OKDRS) is the single Designated State Agency for these funds. OKDRS is a combined agency, no distribution is required.

These estimates per year are for FFY 2020 and FFY 2021.

Title I, Part B, Priority Group 1 — Estimated Funds = 10,890,738 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 2 — Estimated Funds = 12,486,051 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 3 — Estimated Funds = 1,623,415 (Average Cost of Services = 2,536)

Title VI, Part B — Estimated Funds = 300,000 (Average Cost of Services = 4,166)

## **6. Program Data**

### **A. Data Alignment and Integration**

Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.

#### **i. Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.**

Currently, two partners under WIOA operate the same case management/reporting system for their respective programs. Labor Exchange and Title 1 programs have utilized an integrated case management/reporting system for many years. This system uses real time data across programs to prevent duplication of services, track program services and calculate integrated performance data, and while it has been practical and economical, it is not utilized by all of the core partners.

All of the partners have a computerized case management system that meets the specific requirements of each program. Over the past year, Oklahoma made strides in developing more integrated information access that links data across core programs. The Department of Vocational Rehabilitation Services (DRS) worked with OESC and OOWD to develop a process for flat file transfer of data that allows for wage matching and performance reporting as required by WIOA. In the coming year, the Title II program will also complete this process for transferring data between respective case management systems to allow for improved ease of reporting performance. While each core partner continues to use their existing systems to gather needed information for required for evaluation and performance reporting, transferring data between partner systems will improve data collection and dissemination and create better integrated case management and reporting across core programs.

Additionally, the Oklahoma Employment Security Commission (OESC), through data sharing MOUs, provides the required wage information for federal reporting purposes in compliance with applicable federal and state laws. Oklahoma also expects the regions to enter into data sharing agreements based on local MOUs.

#### **ii. Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.**

Oklahoma is committed to the goals of eliminating duplication of services and addressing the needs of common intake and case management. The core partners are working to increase the exchange of data to the maximum extent possible. Data sharing MOUs address the use of wage

record data in order to successfully comply with WIOA performance accountability measures and state indicators of performance. Integrated information access was recently developed to provide a platform for linking data across core partners to streamline intake and service delivery across all programs. Integrated information provides real-time data to be used allowing participants to be tracked across programs eliminating service duplication and partner service utilization. The WIOA Data Group has been working toward integration for intake, performance, and reporting.

**iii. Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.**

Oklahoma is dedicated to developing a roadmap toward greater data alignment and integration of participant and performance data across core programs with the ultimate goal of providing effective and efficient services that leads to the participants' credential attainment and employment. The development and implementation of a data system that will allow the sharing of participant information and services across core programs will make benchmarking a reality.

Under the current Governor's administration, technology modernization is a priority. Over the past few years, Oklahoma has worked with the State Regents for Higher Education, the State Department of Education, the Oklahoma Department of Career and Technology Education, the Oklahoma Employment Security Commission, the Department of Rehabilitation Services, and the Oklahoma Office of Management and Enterprise Services to develop plans for data connectivity. We intend to use the Governor's interest in data and technology infrastructure to move this work forward. Effective collection and utilization of education, workforce, and economic data is essential to Oklahoma's ability to decrease the gap between labor supply and demand, and to generate wealth for all Oklahomans. With this in mind, an ad hoc committee will be created under the State Workforce Board to make technology and data system alignment a reality.

Integrated information access was recently developed to provide a platform for linking data across data-generating agencies necessary to improve data collection and dissemination, and to inform and support the strategies of Governor's Council. Existing WIOA formula funds can be used, at the Governor's discretion, to assist with data collection and research projects at the state and local levels that are conducted and/or guided by the Governor's Council.

Representatives from all WIOA core programs, Title I, Adult Basic Education, Department of Rehabilitation Services, and The Oklahoma Employment Security Commission, have all participated in workgroups, with representatives meeting with State Board staff either collectively or program to program. To date, the workgroup has done all of the following:

- exchanged information about common data elements that support assessment and evaluation
- exchanged information about data systems in-use and extant performance reporting processes

- shared information on WIOA performance metrics, reporting requirements, regulations, and guidelines

**iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).**

State agencies will work with the Governor's Council for Workforce and Economic Development to ensure required reports for the performance accountability are completed to the best of the state's ability. The State is working to re-establish its WIOA Data Group which will ensure compliance of WIOA section 116 (D) (2) is maintained and develop processes as necessary. The WIOA Data Group will have full support of leadership to coordinate across platforms for the purposes of the Oklahoma Works system.

OESC and OOWD:

OESC and OOWD programs utilize America's Job Link Alliance - Technical Support (AJLA-TS) which provides Oklahoma with a vendor hosted management information system, OKJobMatch. OKJobmatch houses data collecting applications JobLink, ServiceLink, ProviderLink, FiscalLink, and ReportLink. Each data collection application is compliant with WIOA Section 116 which requires the establishment and operation of a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education.

OKJobMatch's JobLink is a self-service labor exchange system that provides job matching and workplace information service for employers and job seekers. Job seekers can establish an account to manage their job search activities, register with labor exchange activities, and explore career pathways utilizing the O\*NET system to deliver highly relevant and precise job and resume matches. Employers can establish an account to manage job openings and view job seeker resumes. Staff can create and manage job orders on behalf of employers.

OKJobMatch's ServiceLink is a client management application that allows case managers to track their caseload and report information required under Labor Exchange, Re- Employment Services, WIOA, TAA (TRA Adjustment Act) and other federal programs. It provides the ability to manage eligibility, maintain program registration, maintain enrollment records, store required and relevant documentation, and provides staff a standardized process for following participants through the workforce development system network. It fully supports all state and federal program, grant, and reporting requirements.

OKJobMatch's ProviderLink provides the integrated statewide Eligible Training Provider (ETP) list, allowing training providers and providers of youth services to create and manage self-service accounts, allows local area and state review processes of ETP eligibility requests, and provides federal program reporting requirements.

OKJobMatch's FiscalLink provides an integrated fiscal management system to provide a real-time fiscal system for one-stop case management. Allowing participant and vendor financial management, accruals, payments, and fiscal reports. The State is increasingly utilizing this

information to determine costs for services and returns on investment for the public workforce system.

OKJobMatch's ReportLink is a web-based, comprehensive workforce program data management system that allows OOWD the ability to validate data and resolve and identified errors prior to submitting quarterly and annual performance reports to the Department of Labor (DOL). ReportLink is updated as needed to implement new edit checks and logic rules development by the Departments.

OOWD (Title I) works with AJLA-TS to ensure that data is collected in accordance with WIOA Section 116 and The Participant Information Record Layout (PIRL) established by the Secretaries of Labor and Education. AJLA-TS provides OOWD the appropriate PIRL files for WIOA Title I Adult, Dislocated Worker, Youth, and Discretionary Grants. OOWD (Title I) utilizes ReportLink to verify the data and verify any errors present within the data, once errors are corrected and data is verified the files are then uploaded and submitted to the Department of Labor.

#### ODCTE:

Adult Basic Education at the Oklahoma Department of Career & Technical Education (ODCTE) currently utilizes LACES (Literacy, Adult and Community Education System) by LiteracyPro Systems, a developer of data management systems for the public and nonprofit sectors. LACES is an online student data management software with the capability of generating daily reports. Engineered for providers of literacy, Adult Basic Education (ABE), and correctional education programs, LACES allows case managers to easily set baselines, track program progress, student goals, and deliver results and streamline data reporting to state and federal agencies. ODCTE anticipates quarterly reports to local WDBs to demonstrate performance for decision making.

#### OKDRS:

The Oklahoma Department of Rehabilitation Services (OKDRS) is utilizing the AWARE case management system by Alliance Enterprises. Alliance Enterprises, Inc. maintains the case management system used by more than 35 Vocational Rehabilitation state agencies throughout the country. In addition to serving as a tool for managing services for vocational rehabilitation programs under Title IV of the WIOA, it also produces reports to meet the reporting requirements of the U.S. Department of Education, Rehabilitation Services Administration.

*Planning Note: States should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.*

## **B. Assessment of Participants' Post-Program Success**

Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and

completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The core workforce partners will utilize the WIOA Performance Measures for the Core Programs to monitor and improve all WIOA core programs. These performance measures include Employment (Second Quarter and Fourth Quarter after Exit), Median Earnings, Credential Attainment Rate, Measurable Skill Gains, and Effectiveness in Serving Employers. Performance for each of these measures will be segmented by Adults, Dislocated Workers, Youth, Adult Education, Wagner-Peyser, and Vocational Rehabilitation. State and local workforce boards will utilize these performance measures in measuring the progress of the core partners in their area. These measures will assist Oklahoma in determining the effectiveness of its workforce development system and allow the state to continuously improve this system.

The state will use the Eligible Training Provider (ETP) system to monitor the completion and employment rate of all participants receiving training services through the workforce system. The ability to review educational programs to ensure that participants are becoming employed in the occupations in which they are trained will assist both the educational system and the workforce system in determining the effectiveness of the training programs being developed and offered in our state. Programs eligible to receive workforce funding for the training of participants will be reviewed on a bi-annual basis and the programs not meeting performance levels set by the state will be removed.

### **C. Use of Unemployment Insurance (UI) Wage Record Data**

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

The state is currently working on MOUs with core partners as well as reviewing state statutes to allow for data sharing among core partners. Some agreements have been made while others are in process. Although agreements have not been made with all partners, Oklahoma has used UI wage records for many years for performance accountability and for labor market information. Currently, wage records are used to calculate performance measures for Title I and Title III programs as prescribed in WIOA.

### **D. Privacy Safeguards**

**Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.**

Data security and privacy is key to ensuring Oklahoma statewide core partner operations are available as authorized to share vital data that is necessary for WIOA and Oklahoma Works partner activities.

The State of Oklahoma consolidated data and operational systems and provides a centralized CyberCommand Security Operations Center within the Office of Management and Enterprise Services Information Services (OMES IS) that protects workforce systems from cyber threats.

Automated tools assist with protecting the network. OMES IS ensures that all workforce systems provide security authorization and user authentication. The data retention policies are required by the Oklahoma Records Management Act for agencies to identify, and adopt a records retention schedule for the retention of documents and data following state and federal mandates. Due to the nature of consolidated operations the state adheres to the U.S Department of Defense standards for data protection and end of life destruction.

The privacy requirements for Family Educational Rights and Privacy Act (FERPA) outlined in section 444 of the General Education Provisions Act (20 U.S.C. 1232g) are enforced through role based user operations that ensure separation of duties and data disclosure. The state mandates the local system staff must be compliant and must sign state confidentiality agreements following data security training. All data sharing agreements and Memorandum of Understanding (MOU) documents are strictly enforced and utilized for all data sharing.

Aggregated data is used to ensure user privacy unless approved agreements allow for participant data that support workforce or education operational and reporting needs. To further protect personally identifiable information collected in WIOA, Unemployment Insurance (UI), and statewide reporting or operational systems including OKJobMatch and ServiceLink, have implemented state level security measures. These include limiting and logging physical access to database servers, 128-byte encryption, SSL and individual password protection to guard against unauthorized access as mandated by state laws and guidelines enforced by OMES IS.

## **7. Priority of Service for Veterans**

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

In Oklahoma, veterans and others eligible for services under Jobs for Veterans State Grants (JVSGs) are identified at various points of entry into Oklahoma's workforce development system. All customers so identified receive priority of service. Through an assessment process using a state provided military registration checklist designed to determine significant barriers to employment, eligible veteran customers at Workforce Centers determined to have significant barriers to employment or designated as eligible by the U.S. Department of Labor are referred for services to a Disabled Veterans Outreach Program Specialist (DVOP) when and where available. Those veterans served at Centers lacking an assigned DVOP, or if the DVOP is not available, are referred to other Workforce Center staff for services. Workforce Centers are also required to have a flowchart describing the process for veteran customers being served and how a significant barrier to employment is determined and if eligible, when the veteran is referred to the DVOP for services. When veterans are registered in OKJobMatch, the state job match and case management system, Workforce Center staff are able to identify those significant barriers to employment for referral to DVOPs.



All local office staff and workforce system partners performing labor exchange through the current Oklahoma electronic workforce system are required to provide veterans and other eligible persons with priority of service. Close monitoring through system reports, field visits, and training is conducted to ensure legislative requirements for veterans are followed.

Additionally, all Local Workforce Development Boards (LWDBs) are required by state policy OETI-25-2009 (Oklahoma Employment and Training Issuance) to ensure that priority of service is applied throughout their respective service delivery systems, including service delivery points maintained by all sub-recipients. The State priority of service policy obligates LWDBs to monitor local service delivery operations to ensure that their internal policies and procedures result in compliance with the priority of service requirements. Furthermore, OETI-25-2009 requires LWDBs to have policy and procedures in place for priority of service for veterans in their area.

The State assures that veterans and others eligible for JVSG-funded services will be afforded employment and training activities authorized in section 134 of the Workforce Innovation and Opportunity Act, and the activities authorized in Chapters 41 and 42 of Title 38 U.S.C. The State assures that it will comply with the Priority of Service for Veterans established in the Job for Veterans Act (Public Law 107-288). The State and the Veterans Employment and Training Service have a memorandum of understanding to ensure services will be provided to veterans as described in Title 38 U.S.C., Chapters 41, 42 and 43; at 20 CFR Chapter IX, CFR, codified at 20 CFR 1001, 100; and all applicable Training and Employment Guidance Letters (TEGLs) and Veterans' Program Letters (VPLs).

All four workforce regions follow TEGL 10-09 and TEGL 19-16 regarding Priority of Service for Veterans. Oklahoma's Adult and Dislocated Worker Policy, OWDI 19-2017 provides guidance for the Priority of Services for Veterans and Eligible Spouses in accordance with TEGL 19-16.

A special committee, OKMilitaryConnection, was formed consisting of cross agency members from OOWD, OESC, ODCTE, Oklahoma Department of Veterans Affairs, and the Oklahoma National Guard, who worked on various efforts to coordinate services and to plan hiring events for returning military personnel and their families. In support of this effort, OOWD launched a website ([OKmilitaryconnection.com](http://OKmilitaryconnection.com)) to connect veterans with these events by pre-registering them and matching them to participating employers at many of these events.

The State is also working with employer councils, trade associations, the State Chamber, local chambers, state and federal agencies and education/training providers to connect transitioning service members, veterans and other eligible persons with quality training and employment. Efforts are also underway with Oklahoma's ODCTE technology centers, community colleges, and four-year institutions to develop fast-track credentialing and degree programs that offer credit for experience gained during military service.

## **8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities**

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

Oklahoma continues to focus on accessibility for both job-seekers and business customers at all levels of the Oklahoma Works system. Working with the Governor's Council for Workforce and Economic Development (GCWED), system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

### **Access for All Initiative**

The Access for All initiative within Oklahoma Works places a focus on recruitment, hiring, and promotion of individuals with disabilities in the state of Oklahoma's workforce system. Access for All focuses on the Oklahoma Works system partners as well as employers in the state. This initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included in efforts to achieve greater household wealth for Oklahomans. Access for All equips Oklahoma's Workforce System with knowledge and resources to make it more accessible to individuals with disabilities that utilize one-stop system programs in person or virtually.

To help build a foundation for the Access for All initiative, the Oklahoma Department of Rehabilitation Services (OKDRS) and Oklahoma ABLE Tech (OKABT), partner to provide regional Access for All technical assistance in the form of academies, webinars, newsletters, and weekly tips statewide. To operationalize the Access for All initiative, a task force has been developing a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool will be accompanied by a system policy and a curated catalog of resources that can be tracked for enhanced professional development.

OOWD works to develop and support increased employment opportunities for individuals with disabilities. Oklahoma Works Center staff routinely refer individuals with disabilities to the OKDRS for more intensive training and job placement opportunities. OKDRS has three certified Social Security Administration (SSA) Work Incentive Counselors working and co-located within Workforce Centers and another three rotating between the remainder of the Workforce Centers and OKDRS offices. Workforce Center staff and OKDRS Benefits Planners collaborate to assist job seekers receiving SSA benefits. When referred by center staff, an OKDRS Benefits Planner will explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark.

## **Oklahoma Adult Education Program - serving individuals with disabilities**

Adults with disabilities fall into two major categories: individuals with physical disabilities and individuals with learning disabilities. Strategies for adults with physical disabilities include ensuring that classroom sites are accessible and that reasonable and appropriate accommodations are made for the individual's disability. Adult secondary students who may need accommodations in adult basic education classes or on the high school equivalency test will be referred to OKDRS, psychologists, or other resources to obtain the required documentation of a learning disability.

Adults with learning disabilities usually possess an information processing dysfunction which interferes with their ability to acquire, remember, and/or retrieve information. Strategies for adults with both learning and physical disabilities include, training for adult education teachers on teaching adults with learning and other disabilities.

### **Business and Employer Outreach**

OOWD partners with OKDRS to utilize its ADA Coordinator as a resource to provide consultation, technical assistance, and site reviews to identify accessibility issues to all workforce system partners and other agencies, entities, and businesses and employers. The OKDRS ADA Coordinator provides training in various aspects of the Americans with Disability Act and the 2010 ADA Standards for Accessible Design to staff and supervisors of these entities as well. These services are available in order to advance the promotion of equal access for individuals with disabilities in programs, services, and buildings statewide.

OKDRS delivers assistive technology for job seekers in their journey to employment. Assistive technology specialists complete a variety of assistive technology assessments and evaluations for job seekers, business work sites, and system partners. Evaluations include home modifications, vehicle modifications, personal mobility needs, computer access, worksite modifications, activities of daily living, communication school accommodations, and accessibility reviews. Assistive technology specialists focus on the reported obstacle, rather than the disability diagnosis. A big part of an assistive technology evaluation is to identify what the real problem or obstacle is for the individual job seeker or business work site.

### **One-stop system certification policy standards for accessibility**

The one-stop system standards and certification criteria policy are designed to integrate physical and programmatic accessibility into the benchmark criteria for center certification. The process for certification of comprehensive and affiliate American Job Centers was revised (OWDI #01-2019) through a collaboration of system partners and local areas as a task force of the Systems Oversight Subcommittee. Certification criteria were aligned to the categories of Customer Focus, Operations and Infrastructure, Equal Opportunity and Accessibility, Personnel, and Continuous Improvement. The Equal Opportunity and Accessibility category includes 8 must-meet criteria items and 3 scored criteria.

Prior to center certification approval, physical and technology accessibility is reviewed at each Oklahoma Works (One-Stop) center by Certification Teams. The Certification Teams are selected by the LWDBs and are responsible for conducting independent and objective evaluations of one-stop sites and making center certification recommendations to LWDBs. When

issues related to physical and programmatic accessibility are identified, an Equally Effective Alternative Access Plan (EEAAP) is created. These plans are designed to function as corrective action plans, which are designed to be monitored regularly and updated by local Equal Opportunity Officers and/or relevant program staff.

## **9. Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners.**

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

The one-stop delivery system will meet the needs of English Language Learners through a variety of methods.

OOWD complies with Section 188 of the Workforce Innovation and Opportunity Act of 2014 (WIOA) [29 CFR 38]. National origin discrimination includes Limited English Proficient individuals under 29 CFR Section 38.9 and specifically states that in providing any aid, benefit, service, or training under a WIOA title I-financially assisted program or activity, a recipient must not, directly or through contractual, licensing, or other arrangements, discriminate on the basis of national origin, including LEP which includes English Language Learners (ELL). Additionally, 29 CFR Section 38.41 added “LEP and preferred language” to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registrant, participant, and terminee.

It is the policy of the State to provide services and information in a language other than English for customers with Limited English Proficiency (LEP) in order to effectively inform or enable those customers to participate in departmental programs or activities. OOWD Limited English Language Proficiency Policy (OWDI 17- 2017) requires LWDBs to take reasonable steps to ensure that LEP individuals have meaningful access to their program and activities. Reasonable steps (29 CFR Section 38.9(b)(1)) may include, but are not limited to, the following:

- Conducting an assessment of an LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English languages, to LEP individuals
- Conducting outreach to LEP communities to improve service delivery in needed languages.

LWDBs must ensure that above all, these services are free of charge and provided in a timely manner. An LEP individual must be given adequate notice about the existence of interpretation and translation services and that they are available free of charge. For LEP individuals who enter an Oklahoma Works (One-Stop) Center, language assistance services must be timely, and with adequate notice, where feasible. Language assistance will be considered timely when it is

provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training. When a LWDB determines a significant proportion of the population eligible to be served are more likely to be directly affected by a program/activity needs information in a single language other than English, the LWDB must translate its written vital program materials into that language and provide effective oral interpretation services to members of the significant LEP group. The State can also provide oral interpreters for LEP customers who are not part of a significant group in order to provide the customer meaningful access to programs and services. When an interpreter for the needed language cannot be located, the Language Line Solutions (1-866- 874-3972) is used to serve the customer.

Language assistance services are also provided to customers accessing virtual services at the One-Stop. For LEP individuals needing to file unemployment claims in Spanish or Vietnamese, the Oklahoma Employment Security Commission's (OESC) Interactive Voice Response (IVR) system includes a full range self-service experience from filing the initial claim to getting updated information about an existing claim. For LEP individuals needing to file claims in other languages, the OESC has a full-service contract with Language Associates Inc. The interpreter services through Language Associates are also available for employers and have been used during Employer Council meetings.

LWDBs must not require an LEP individual to provide their own interpreter. Furthermore, LWDBs must not rely on an LEP individual's minor child or adult family or friend to interpret or facilitate communication, except for the following circumstances:

- In emergency situations while awaiting a qualified interpreter;
- When the information conveyed is of minimal importance to the services to be provided; or
- When an LEP individual specifically requests that an accompanying adult provide language assistance and they agree to provide assistance to the individual. If a Local Area permits an accompanying adult to serve as an interpreter for an LEP individual, it must make and retain a record of the LEP individual's decision to use their own interpreter.

Finally, where precise, complete, and accurate interpretations or translation of information and/or testimony are critical for adjudicatory or legal reasons, LWDBs can still provide their own, independent interpreter, even if an LEP individual wants to use their own interpreter as well. This also applies in cases where the competency of the interpreter requested by the LEP individual is not established. (29 CFR Section 38.9(f))

LWDBs must also include a Babel Notice, indicating that language assistance is available in all communications of vital information. This includes letters or decisions in hardcopy or electronic formats. (29 CFR Section 38.9(g)) OOWD provides technical assistance to LWDBs regarding Babel Notices in TA-02-2019.

## **IV. Coordination with State Plan Programs**

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

The Oklahoma Core Partner Agency Directors, a discussion group working on Core Partner WIOA Programs compliance, were engaged in writing and also, appointed staff to draft the state plan. The core partner staff organized to develop the planning process. In developing the Unified State Plan, the core partners met and continue to meet to share information, compile data, and focus on the outcomes of the workforce system and state plan process.

The following statewide efforts highlight the specific state plan programs representing the work of core partner programs and the state workforce system:

Within Oklahoma, The Governor's Council for Workforce and Economic Development (GCWED) has been tasked with using data to inform policy, track progress and measure success. State workforce partners, departments, and agencies impacting career readiness will develop state performance metrics, benchmarks and targets.

#### System Oversight Subcommittee

The Oklahoma Works System Oversight Subcommittee, established in 2012, is composed of Oklahoma workforce development system partners, including the Governor's Council for Workforce and Economic Development, the Oklahoma Department of Career and Technology Education—Adult Basic Education, the Department of Rehabilitation Services - Vocational Rehabilitation, the Department of Human Services, the Oklahoma Employment Security Commission--Wagner-Peyser, the State Regents for Higher Education, the Oklahoma Department of Commerce, and Title I programs representing Adults, Dislocated Workers and Youth. The business community is also represented. It is hoped that other entities, such as the Department of Corrections, and the Departments of Health and Mental Health will eventually be added to establish a more comprehensive approach for creating solutions.

Recognizing the necessity to build a new, more responsive, workforce development system to meet the needs of Oklahoma's businesses and create wealth for the state, the team has been a cohesive unit. This subcommittee was designed to carry out the strategic mission of GCWED and reports to the Workforce System Oversight Committee of that body.

At the present time, the committee is collaborating in writing and identifying policies and processes that will continue to build and improve the workforce development system in wake of the WIOA implementation, as well as contribute to Oklahoma's overall economic well-being. They meet on a regular basis and identify program specific barriers and create solutions to move forward. Most of the local areas are in the process of building partnerships to accomplish their version of the utopian system and require guidance from this team; discovering they feel very comfortable requesting assistance from their peers representing their agency.

The WIOA requires local planning regions to write local and regional plans and updates. The sub- committee is actively working on reviewing plan updates which will include input from all the agencies involved. There are several ways the state's workforce system will benefit from the regional unified plans, some which include: a more effective, consistent, user-friendly, customer-focused, high quality service-delivery approach for Oklahoma citizens and businesses; efficiencies for workforce programs and staff; alignment among education, workforce, and

economic development; accountability for services and results; maximizing all workforce development resources; a true competitive advantage for Oklahoma's economic development efforts; and a pipeline of appropriately skilled and credentialed workers ready to meet the employment needs of Oklahoma employers

#### Access for All Initiative

Oklahoma is focused on accessibility for all jobseekers, businesses and employer's work sites throughout Oklahoma. Working with Oklahoma Works, the system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The Oklahoma Department of Rehabilitation Services is leading Oklahoma's Workforce System towards enhanced accessibility. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

The Access for All Initiative within Oklahoma Works places a focus on recruitment, hiring, and promotion of individuals with disabilities in the State of Oklahoma's workforce. Access for All focuses on the Oklahoma Works system partners as well as employers in the state. The initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included. Access for All equips Oklahoma's Workforce System with knowledge and resources to make it more accessible to individuals with disabilities that utilize one-stop programs in person, on the phone, or through the web. Access for All is brought to Oklahoma Works through a partnership between the Oklahoma Department of Rehabilitation Services and Oklahoma ABLE Tech (Oklahoma's Assistive Technology Act Program).

The one-stop system standards and certification criteria policy will be designed utilizing the Americans with Disability Act (ADA) for physical accessibility. The Oklahoma Electronic and Information Technology Accessibility Law and Standards will be applied for accessibility of digital services. The Web Content Accessibility Guidelines (WCAG) 2.0, Levels A and AA, will be utilized for websites, web applications, and digital documents certification criteria and standards.

Ensuring opportunities for all is critical to meet the goal in creating an environment where people with disabilities have the same opportunities to participate in the workforce as do people without disabilities. As businesses and employers find that the labor pool is tightening, following through on these criteria and standards will ensure businesses and employers have access to more qualified people to fill needed positions.

#### Youth

We are committed to providing youth with skills and tools necessary for successful participation in education and training programs, resulting in credentials and/ or degrees and employment in careers in high demand sectors.

The Governor's Council for Workforce and Economic Development's Youth Committee was established to identify and address youth workforce issues. The current state of Oklahoma youth population is constantly scanned to ensure advancement for the purpose of developing a statewide plan in support of youth and a communication infrastructure that will inform and engage all stakeholders. This includes dropout prevention for youth 14 and above (14-21) and recovery strategies for those disengaged youth (16-24) years of age.

The State Workforce Youth Programs committee consists of various state agency representatives, juvenile court judges, Job Corps., non-profit groups specializing in youth issues, private sector representatives, and youth participants in various state and federal programs. The Committee provides recommendations on policy and performance for the development and implementation of WIOA youth funded programs statewide, and creates an Oklahoma workforce strategy for youth that aligns with youth initiatives and provides common solutions that coordinate with the state's economic goals building wealth creation for all Oklahomans.

All youth activities focus on developing Oklahoma's youth to meet the demands of Oklahoma business. This philosophy includes emphasis on increasing the high school graduation rate so that Oklahoma has the highest rate in the nation, increasing the number of postsecondary graduates in the state, and introducing youth, educators, and parents to Oklahoma's targeted industry clusters, the skills needed, and the career pathways and opportunities available. This vision requires facilitating and modeling meaningful youth involvement and creating system-wide solutions by aligning workforce development, education, youth-serve agencies and nonprofits, and business to improve opportunities and the quality of life for Oklahoma's youth.

The Oklahoma State Workforce Youth Programs committee promotes youth development by facilitating the collaboration and alignment of statewide and local services that are of the highest quality and responsive to the needs of all youth.

## **V. Common Assurances (for all core programs)**

The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;    Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes;    Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;    Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and



comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board; Yes

5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities; Yes

6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3); Yes

7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable; Yes

8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program; Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs; Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA); Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

## **VI. Program-Specific Requirements for Core Programs**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **Adult, Dislocated Worker, and Youth Activities under Title I-B**

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B--

#### **a. General Requirements**

##### **1. Regions and Local Workforce Development Areas**

###### **A. Identify the regions and the local workforce development areas designated in the State.**

Oklahoma designated four planning regions identified as Central, Northeast, Western and Southeast that are comprised of the seven local workforce development areas. These regions

were identified through nine public statewide meetings, with input from the Oklahoma Employment Security Commission, Oklahoma Department of Career and Technology Education, and the Oklahoma Department of Rehabilitation Services, regional business leaders, and identified through labor market areas, regional assessments, regional asset mapping, market areas, commuting patterns, employment, population and demographics. The four planning regions provide the best alignment with areas such as the Oklahoma Department of Commerce Economic Development Areas and the Oklahoma Health Care Authority Regions. Each area has sufficient federal and non-federal funding and appropriate education and training providers to administer regional activity.

The four designated Planning Regions consist of the following counties and local workforce development areas.

#### **CENTRAL PLANNING REGION**

The Central Planning Region is comprised of one (1) Workforce Development Area: Central Oklahoma Workforce Innovation Board. The Central Planning Region is comprised of the following nine (9) counties: Canadian, Cleveland, Hughes, Lincoln, Logan, Okfuskee, Oklahoma, Pottawatomie, and Seminole

#### **NORTHEAST PLANNING REGION**

The Northeast Planning Region is comprised of three (3) Workforce Development Areas: Eastern Workforce Development Board, Northeast Oklahoma Workforce Development Board, and Workforce Tulsa. The Northeast Planning Region is comprised of the following eighteen (18) counties: Adair, Cherokee, Craig, Creek, Delaware, Mayes, McIntosh, Muskogee, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Rogers, Sequoyah, Tulsa, Wagoner, Washington

#### **SOUTHEAST PLANNING REGION**

The Southeast Planning Region is comprised of the one (1) Workforce Development Area: Southern Workforce Board. The Southeast Planning Region is comprised of the following seventeen (17) counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc, Pushmataha

#### **WESTERN PLANNING REGION**

The Western Planning Region is comprised of two (2) Workforce Development Areas: Western Oklahoma Workforce Development Board, South Central Workforce Investment Board. The Western Planning Region is comprised of the following thirty-three (33) counties: Alfalfa, Beaver, Beckham, Blaine, Caddo., Comanche, Cimarron, Cotton, Custer, Dewey, Ellis, Garfield, Grady, Grant, Greer, Harmon, Harper, Jackson, Jefferson, Kay, Kingfisher, Kiowa, Major, McClain, Noble, Payne, Roger Mills, Stephens, Texas, Tillman, Washita, Woods, Woodward

#### **Local Workforce Development Areas**

Central Oklahoma Workforce Development Area

In 2019 the Central Oklahoma Workforce Development Area's (WDA) population was 1,438,177. The Central WDA is composed of the following counties: Canadian, Cleveland, Logan, Oklahoma, Hughes, Lincoln, Okfuskee, Pottawatomie, Seminole.

#### Eastern Oklahoma Workforce Development Area

The Eastern Oklahoma Workforce Development Area is composed of the following counties: Adair, Cherokee, McIntosh, Muskogee, Okmulgee, Sequoyah, and Wagoner. The Eastern WDA's population was 319,339 in 2019.

#### Northeast Oklahoma Workforce Development Area

In 2019 the Northeast Workforce Development Area's population was 284,121. The Northeast WDA is composed of the following counties: Craig, Delaware, Mayes, Nowata, Ottawa, Rogers and Washington.

#### South Central Oklahoma Workforce Development Area

In 2019 South Central Workforce Development Area's population was 307,277. The South Central WDA is composed of the following counties: Caddo, Comanche, Cotton, Grady, Jefferson, McClain, Stephens and Tillman.

#### Southern Oklahoma Workforce Development Area

In 2019 the Southern Oklahoma Workforce Development Area's population was 408,380. The Southern WDA is composed of the following counties: Atoka, Bryan, Carter, Choctaw, Coal, Garvin, Haskell, Johnston, Latimer, Le Flore, Love, Marshall, McCurtain, Murray, Pittsburg, Pontotoc and Pushmataha.

#### Tulsa Area Oklahoma Workforce Development Area

In 2019 the Tulsa Oklahoma Workforce Development Area's population was 789,049. The Tulsa WDA is composed of the following counties: Creek, Osage, Pawnee and Tulsa.

#### Western Oklahoma Workforce Development Area

The Western Oklahoma Workforce Development Area is composed of the following counties: Alfalfa, Beaver, Beckham, Blaine, Cimarron, Custer, Dewey, Ellis, Garfield, Grant, Greer, Harmon, Harper, Jackson, Kay, Kingfisher, Kiowa, Major, Noble, Payne, Roger Mills, Texas, Washita, Woods and Woodward. In 2019, the Western Oklahoma WDA's population was 417,711.

**B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.**

Due to continued reductions in funding, and in an effort to increase funding for direct client services, Oklahoma has made a concentrated effort to work in conjunction with local areas to encourage them to seek re-designation and look at ways to streamline administrative costs. As an example of the state's efforts in this area to improve effectiveness and efficiency, since 2016, Oklahoma has reduced the number of local workforce areas from 11 to 7 and reduced the number

of fiscal agents from 10 to 4, since 2010. The Governor's Council approved workforce development areas are: Central, Eastern, Northeast, South Central, Southern, Tulsa, and Western.

### **Designation of Workforce Development Areas**

The Governor's Council recommends designations of local workforce development areas and will continue to work with local workforce areas on re-designation requests. Any contemplated changes in areas are discussed with all parties involved including the local elected officials, Workforce Development Boards, and service providers. Changes in workforce development areas are done only in the best interests of the State and the business and job seeker customers in that area.

State policy OWDI #02-2015, Local Area Initial Designation Process, provides guidance for the application and appeal for initial designation decisions. Once a completed application is received, the Governor's Council for Workforce and Economic Development Workforce System Oversight Committee (WSOC), in collaboration with the appropriate staff from the OOWD will verify the information provided in the application. The WSOC will use the results of this assessment to determine whether to recommend approval or denial of the application.

For redesignation of an area, an agreement must be reached by local area elected officials and a formal request for a new area or redesignation may be sent to the Governor through his/her administrative entity, the Oklahoma Office of Workforce Development (OOWD). In addition to review by OOWD, the Governor's Council for Workforce and Economic Development (GCWED) through its Workforce System Oversight Committee or through routinely scheduled meetings of the entire Council, shall review the request and may offer recommendation of the approval of the area. This process is detailed in state policy OWDI #02-2017, Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board.

#### **Related Policies**

- OWDI 02-2015 Local Area Initial Designation Process- issued July 1, 2015
- OWDI 06-2015 Process for Existing Local Workforce Development Area Conditional Designation - issued July 1, 2015
- OWDI 02-2017 Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board - issued February 6, 2017

#### **“Performed successfully” and “Sustained fiscal integrity”**

The criteria of “performed successfully” and “sustained fiscal integrity” are defined in the Local Area Initial Designation Process (OWDI #02-2015). The policy defines “performed successfully” as a local area having achieved at least 80 percent of their local performance goal on each performance measure for PYs 2012 and 2013.

The policy defines “sustained fiscal integrity” as such that the local area has not been found in violation of one or more of the following during PYs 2012 or 2013:

1. Final determination finding(s) from audits, evaluations, or other reviews conducted by State or local governmental agencies or the Department of Labor identifying issues of

fiscal integrity or misexpended funds due to the willful disregard or failure to comply with any WIA requirement, such as failure to grant priority of service or verify participant eligibility: or

2. Gross negligence - defined as a conscious and voluntary disregard of the need to use reasonable care, which is likely to cause foreseeable grave injury or harm to persons, property, or both; or
3. Any failure to observe accepted standards of administration. Local areas must adhere to the uniform administrative requirements set forth in Title 2 CFR Part 200, and Title 29 CFR Parts 95 and 97. **Local areas must have fully met their federally mandated responsibilities for the two previous program years (PY 2012 and PY 2013) and including timely reporting of WIA participant and expenditure data, timely completion and submission of the required annual single audit, and have not been placed on cash hold for longer than 30 days.** [In alignment with WIOA Section 106(e)(2).]

Additionally, the Process for Local Area Redesignation within a Region, Consolidation, and/or Creation of a New Local Board (OWDI 02-2017) outlines necessary assurances related to determining “performed successfully” and “sustained fiscal integrity” criteria have been met.

#### **Necessary Assurances**

- The new board shall comply with the applicable uniform cost principles included in the appropriate circulars or rules of the Office of Management and Budget (OMB). [WIOA Section 184(a) (3)].
- All financial reporting shall be done in compliance with federal and state regulations, and guidance (i.e., directives and information notices) issued by OOWD. Failure to comply with financial reporting requirements will be subject to potential cash hold. [29 Code of Federal Regulations (CFR) 97.21(g)].
- All close out reports will comply with the policies and procedures listed.
- The new board will comply with the audit requirements specified in Title 2 CFR Subtitle A Chapter II Part 200 Subpart F. Failure to comply may result in sanctions imposed by the State.
- The new board will maintain and provide to auditors, at all levels, accounting and program records including supporting source documentation.
- No funds received under WIOA will be used to assist, promote, or deter union organizing. [WIOA Section 181(b)(7)].
- The new board will comply with the nondiscrimination provisions of WIOA Section 188, including the collection of necessary data.
- Funds will be spent in accordance with written United States Department of Labor guidance, and other applicable federal and state laws and regulations.
- The board’s procurement procedures will avoid acquisition of unnecessary or duplicative items, software, and subscriptions. (In alignment with 2 CFR Part 200.318).
- The new board will comply with future State Board (GCWED) policies and guidelines, legislative mandates and/or other special provisions as may be required under federal law or policy, including the WIOA or State legislation.

- Priority shall be given to veterans, recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career and training services funded by WIOA Adult funding. [WIOA Section 134(c)(3)(E) and Training and Employment Guidance Letter 10-09].
- If the new board is located within a planning region they will be required to meet the regional planning requirements of WIOA Section 106 (c) (1).

**C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.**

The appeals process relating to designation of local areas is outlined in [OWDI 02-2015](#) Local Area Initial Designation Process (issued July 1, 2015). An area may appeal the denial of its request for initial designation to the Workforce System Oversight Committee (WSOC) of the Governor's Council for Workforce and Economic Development by requesting an appeal and hearing within 20 calendar days from the mailing date of the notice of denial of initial designation. The written appeal request must specify the grounds on which the appeal is sought and why the appellant should be initially designated. Within five (5) calendar days of the receipt of the appeal, the WSOC will contact the appellant and schedule a hearing date. The WSOC will conduct the hearing process and provide a written decision no later than five (5) calendar days after the hearing. The approval or denial will be sent as a recommendation to the Governor, with whom the final decision rests. A second level of appeal may be submitted to the U.S. Department of Labor [WIOA Section 106(b)(5)] within 14 days, with a copy provided to the Dallas ETA Regional Administrator.

**D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.**

The appeals process relating to WIOA determinations for infrastructure funding is outlined in OWDI 24-2017. One-Stop partners have the right to file an appeal of the Governor's determination regarding the one-stop partner's portion of funds to be provided for one-stop infrastructure costs under the SFM. The appeal process related to the SFM is a modified version of the complaint and grievance procedures found in OWDI #16-2017, Change 1.

Within 5 business days from the notification of contributions under the SFM, appeals may be sent by email to [workforce@okcommerce.gov](mailto:workforce@okcommerce.gov), or mail to: Oklahoma Office of Workforce Development 900 N. Portland Ave. Oklahoma City, OK 73107

An opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the appeal. The Contents of the Appeal must contain a clear and concise statement of the facts describing the appeal. The statement of facts should include enough information to allow the entity to determine whether provisions of WIOA, the WIOA regulations, grant or other agreements under WIOA believed to have been violated; The remedy sought by the complainant.

Informal resolution: An attempt must first be made to informally resolve the complaint to the satisfaction of all parties. Informal resolution must be completed within 10 business days from

the date the complaint was filed. If all parties are satisfied, the complaint is considered resolved and a letter outlining the funding agreement is attached to the appeal and sent to the parties.

Hearing: Any party dissatisfied with the determination from the informal resolution or no determination is made, any party may request a hearing for the appeal in writing within 2 business days from the close of the 10-day informal resolution period. The request for a hearing must be filed in writing to [workforce@okcommerce.gov](mailto:workforce@okcommerce.gov) or to: Oklahoma Office of Workforce Development (OOWD) Oklahoma Department of Commerce 900 North Portland Avenue Oklahoma City, OK 73107

Upon receipt of the request for a State hearing, the Executive Director of OOWD or his/her designee shall review the appeal and shall provide an opportunity for a hearing. The Executive Director of OOWD or his/her designee shall notify the complainant and the respondent within 10 business days of receipt of the hearing request.

Hearing procedure:

In any hearing conducted pursuant to a SFM appeal, all parties shall be afforded an opportunity for a hearing with the Appellate Panel after reasonable notice. Such notice shall include:

- The date, time, and place of the hearing, in writing at least 10 business days prior to the date of hearing;
- The original appeal filed and documentation of informal resolution attempts;
- Relevant sections of WIOA or any other federal regulations involved;
- If not in the original filed appeal, a statement of the foundation for the appeal. The statement must accurately reflect the content of the appeal as submitted by the complainant. However, clarifying notes may be added to ensure the appeal is addressed accurately; and,
- The right of the parties to be represented by an attorney or another designated representative (at their own expense).

The hearing is conducted in an informal manner in front of the Appellate Panel with strict rules of evidence not being applicable. Both parties have the right to present written and/or oral testimony and arguments; the right to call and question witnesses; the right to request and examine records and documents relevant to the issues; and the right to be represented. All evidence and a list of witnesses must be made available in advance to all parties five (5) business days prior to the hearing. Prior to the hearing, the Chair of the Appellate Panel will inform the parties, in writing, the hearing process (i.e., order of arguments, rebuttals, time restrictions, etc). The hearing will be recorded electronically.

The hearing process will be completed within 60 days from the date the appeal/request for hearing was received by OOWD.

Composition of Appellate Panel: The Appellate Panel will consist of three (3) members who are appointed by the Executive Director of OOWD, along with two (2) alternates. Where feasible, the Panel may include a representative from the Governor's Council for Workforce and Economic Development, a State Agency partner, and a Local Area Staff member of any of the WIOA Core Programs. Alternates may be any combination chosen from any of the above

entities, including OOWD staff or hired entities. The Executive Director of OOWD or his/her designee will oversee the hearing.

Final Decision by Appellate Panel: Unless precluded by law, informal disposition or resolution may be made of any individual proceeding by stipulation, agreed settlement, consent order, or default.

If informal disposition or resolution is not achieved, the Appellate Panel shall, within 60 calendar days from the date the complaint was filed, mail electronically and via the United States Postal Service, a written decision to both parties. The decision shall contain the following information:

- The names of the parties involved;
- A statement of the SFM appeal and issues related to the appeal;
- A statement of the facts;
- The State Appellate Panel's decision and the reasons for the decision; and
- A statement of the action, if any, to be taken.

The determination by the Appellate Panel for the SFM is considered final.

## **2. Statewide Activities**

### **A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.**

The Oklahoma Office of Workforce Development (OOWD) oversees the administration of the Workforce Innovation and Opportunity Act (WIOA) Title I programs. As administrator, OOWD issues policy guidance through its series of Oklahoma Workforce Development Issuances (OWDIs) and formal memos that are posted online on the Oklahoma Works website at <https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/>.

State funds are used to support Oklahoma Works which is the umbrella entity for both workforce and education coordination. In addition, the funds are used to augment funds at the local level to provide incentives for performance and for statewide activities that might be identified by the Governor.

The Workforce Innovation and Opportunity Act provides new opportunities for use of funds to support integrated workforce activities across the state. Oklahoma will follow all applicable Federal regulations and guidance pertaining to the use of each individual funding source while allowing limited amount of funding for statewide initiatives at the discretion of the Governor. Funding will be primarily used in the support and development of strong regional sector strategies. Also, planning regions that share administrative costs will allow more resources to be prioritized toward training individuals for the state's most in-demand occupations enhancing wealth-creation for all Oklahomans.

System governance policies and guidance are collaboratively developed by the System Oversight Subcommittee of the Workforce System Oversight Committee of the Governor's Council for



Workforce and Economic Development. This group is composed of core and required partners who work collaboratively to develop policy for the state system. Additional partners and workforce system stakeholders are consulted through a task force model and have the opportunity to provide feedback to policy drafts based on areas of subject matter expertise. When released, all policies are located on the Oklahoma Works website.

**B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.**

The Governor's set aside funding is used to lead efforts in expanding and enhancing the state's workforce system. These efforts include access to data, sponsoring events to bridge the gaps existing between education and business & industry. While spending occurs at the state level the impact of the use of the set aside funding spreads across the state, reaching regions and local areas. Examples of this impact, as funded with the Governor's set aside funding include:

**Monitoring & Technical Assistance:** In addition to the required monitoring for WIOA Title I programs, the Governor's set aside funds additional technical assistance for financial, programmatic and strategic operations. The Oklahoma Office of Workforce Development (OOWD) has focused on increasing and improving technical assistance available to local boards as well as system partners. These efforts continue to be a priority for the state. The utilization of set aside funds, was critical in assisting the Workforce Development Areas transition from WIA to WIOA and remains critical as the state moves its focus from implementation to system enhancement and improvement.

**Non-formula Local Area Awards:** The State uses a portion of the Governor's set aside funds to provide various awards to Local Workforce Development Areas. These awards include but are not limited to: discretionary awards for system improvements as prioritized and outlined in WIOA; performance incentive awards; and programmatic pilot efforts as allowable with WIOA and federal regulations.

**Software & Systems:** Set aside funding is used to purchase licenses to, and maintain, various software and systems. These systems allow the state to provide an extensive case management and labor exchange system, increase accessibility to data, operate electronic grants management processes, increase the accessibility of state resources to local areas and system partners, and improve the effectiveness and efficiencies of state administration. Examples of these systems, as funded by the Governor's set aside, include but are not limited to: America's Joblink Alliance via contract with the Oklahoma Employment Security Commission, EMSI Analyst, OKGrants via contract with Agate Software, Zendesk, Dropbox, and Smartsheet.

**Sponsorships:** Set aside funding used to sponsor events throughout the state is used only on events that encourage collaboration and partnerships between business & industry, education and the WIOA system partners. One outstanding example is the Oklahoma Education and Industry Partnership initiative. This initiative strives to bridge the gap between the needs of the private

sector and education. The closer we can bring all of the partners, the further each generation of workforce will be able to carry Oklahoma's economy. The Oklahoma Works Partners Conference is another yearly sponsorship that brings individuals with a variety of positions from the partners together for education, professional development and collaboration. Subject matter experts including representatives from different federal agencies are present to offer their expertise, improving the knowledge of the individuals working to serve Oklahoma's population.

**Memberships:** Set aside funds are also used to fund critical memberships with organizations whose efforts and activities provide states with information, tools and assistance proven to improve the success of their workforce development system efforts. These organizations include the National Governors Association, the National Association of State Workforce Boards, and the National Association of Workforce Boards.

The Governor's set aside has allowed the state to accomplish its goals of expanding the amount of technical assistance, providing assistance for planning regions and partners, and supplementing the efforts and growth initiated by the ApprenticeshipUSA grant. Moving forward, the state will maintain the efforts as described above and will also explore and evaluate directions and improvements designed to improve the workforce system in Oklahoma.

The Oklahoma Office of Workforce Development (OOWD) assumes responsibility for all statewide Rapid Response efforts. These activities are provided as part of a comprehensive workforce investment system designed to respond quickly when a layoff and/or plant closure appears imminent. Staff members at OOWD, the Oklahoma Employment Security Commission (OESC), local WDBs, Oklahoma Department of Career and Technology Education (ODCTE), Rehabilitation Services and other system partners respond quickly to employer, employee and community needs when layoffs and/or plant closures occur. The objective of the Rapid Response team is to help workers transition from notification of layoff to re-employment as soon as possible.

Oklahoma maintains a database of WARN and non-WARN layoffs and plant closings. This database captures the number and job titles of workers laid off, the reason for layoff, presence of a labor union, and tracks the services provided to the employers and affected workers. This information is available to the public at [www.okjobmatch.com](http://www.okjobmatch.com). When the layoff or closure involves organized labor, Rapid Response works closely with organized labor representatives in conducting Rapid Response activities.

Rapid Response funds are used at the state level by OOWD and OESC. They are set aside for emergencies, or for when all allocated resources are expended. The local areas are involved as a part of the Rapid Response Team, but Rapid Response funds are not currently allocated to local workforce boards, but the state plan to move in that direction in the coming year.

The vast majority of companies in Oklahoma do not fall under the WARN Act provisions, so most are not statutorily required to file a WARN notification. Notices of impending layoffs received from these employers are informal in nature. These may include telephone calls from local elected officials, local workforce area service providers, economic development

professionals, the employer, or the affected workers themselves. The affected workers in this situation are also offered Rapid Response services.

Once the OOWD receives notification of a layoff, a telephone call or personal visit is made to the company to gather information about the layoff, explain Rapid Response services and processes, and set up employee meetings. The remainder of the Rapid Response team (including the partners listed previously) is then notified. The team makes every effort to work with the employer to set up meetings during the affected workers' shifts so workers can continue to be paid while learning about the various services available.

This often results in Rapid Response meetings held during early morning hours, on weekends, and late in the evenings. If it is not possible to conduct Rapid Response meetings on company time, then the workers are notified by announcement at the workplace and/or through the news media of the time and place for the meetings.

A team of workforce professionals and other service providers present information to affected workers at all Rapid Response meetings. Affected workers receive a 40- page handbook - Tools and Resources for Transitioning to Your Next Job. The handbook includes information about services and resources to help them get through the layoff and move to new employment as quickly as possible, including: programs and assistance available at their local Oklahoma Works American Job Center, tips for job searches, including resume development and interviewing skills, community services like consumer credit counseling, healthcare, and childcare, access to helpful websites, and physical locations of local Oklahoma Works American Job Centers.

Each section of the meeting starts with a short video related to the information they will be receiving next. Workers are told which documentation they will need to register for Oklahoma Works and Unemployment Insurance programs/benefits, and they are given an approximate timetable on how quickly services can be provided. In many cases, job fairs are scheduled and held for the affected workers on the day of the Rapid Response meeting. All materials are available in both English and Spanish. Each presenter receives a handout reminding them of effective presentation techniques for the meeting. Records are kept on all rapid response events, including sign-in sheets, number of employees in attendance, an initial inventory of each employee's needs, and a satisfaction survey related to the meeting. Rapid Response events are consistently rated at 3.6 out of a possible 4.

Because receipt of a WARN notice is not sufficient, in most cases, for helping avert a layoff, proactive layoff aversion strategies are needed. Oklahoma has a number of strategies in place, including:

- Incumbent Worker Training will be implemented at the state level in Oklahoma beginning in 2020 to help avert layoffs.
- Oklahoma Works Rapid Response staff monitor news feeds, maintain relationships with business and industry across the state, and touch base with workforce teams and economic developers at the local level for information related to Oklahoma companies that may be in distress. When companies are identified, contact is made with the

company and/or local economic development officials to offer support and needed services.

- OOWD utilizes proprietary software by Dun and Bradstreet to identify struggling businesses and performs outreach to determine if layoff aversion services would be beneficial to the company.
- Local Workforce Development Boards (LWDBs) have strong relationships with local economic development staff and the companies in their area. These relationships sometimes allow the LWDB to become aware of challenges a company is experiencing and provides an opportunity to offer layoff aversion assistance.
- Oklahoma Employment Security Commission(OESC)- Local Oklahoma Works Centers often hear about companies in their area that may be struggling. Working with local and/or state economic developers allows for proactive efforts to avert potential layoffs.
- Oklahoma Department of Commerce - Rural Development Specialists (RDSs) live and work in their assigned areas across the state. They call on companies, provide resource referrals as needed, and build relationships with the companies. When companies experience difficulties, they often turn to the RDSs, who bring in a variety of resources to help solve problems. The Commerce Research Team provides research services for companies as needed. For example, a company in rural Oklahoma was having supply chain issues. The Commerce research team pulled together information and resources to help the company find additional/alternative supply chain resources. Without that assistance, layoffs may have been necessary. Proactive communications and call trips to corporate headquarters of Oklahoma companies, often by the Governor, help Oklahoma know of any issues corporate offices see at the local level. Issues can then be addressed effectively.
- Oklahoma's Career and Technology Education system (CareerTech) consisting of 29 technology center districts with 59 campuses provides technical, management, safety, and process improvement training for incumbent workers in Oklahoma companies. CareerTech also provides startup training when qualifying companies that are expanding and hiring new employees for that expansion.

Layoff Aversion/Business Retention and Expansion is ultimately about keeping existing businesses strong and growing. Oklahoma's workforce system strives to ensure we have the business relationships necessary to understand employer needs, to be aware of challenges they are experiencing, and be able to assist them in getting to the resources they need to succeed. This includes the assurance of access to a talent pipeline that has the skills and credentials demanded by employers.

**C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.**

The state will provide Rapid Response services to areas that have natural disasters affecting the ability to be employed and receive income. The intent will be to provide assistance to employees until they are able to work again and their employer is able to provide a place of employment. This will be accomplished by coordinated efforts of core partners, emergency management partners, charitable service providers and business services providers.

The Rapid Response Coordinator will discuss with the Oklahoma Employment Security Commission Area Manager, the Local Workforce Development Board Director, and the local and state emergency management agencies what services are required and what businesses are impacted. The group will also discuss if a National Emergency Grant is needed. If required the group will also provide the Governor's office with necessary information.

The Oklahoma Office of Workforce Development will track and identify needs, notify the Business Services representatives at Local Workforce Development Boards. The Business Services representative will contact the affected business to determine the types and scale of needs. Frequently the business site may not be available, so the local Business Services representative will need to secure a meeting place. The Business Services representative will coordinate with partners to provide services as needed by the employees.

This should include:

- Oklahoma Employment Security Commission Area Manager or their designated representative
- The local One-stop operator
- Unemployment Insurance Department of OESC or their designated representative
- Oklahoma Department of Insurance
- Local and State Emergency Management Agencies

If needed this will also include:

- Veteran Services Department of OESC
- Tribal Governments
- FEMA
- Oklahoma Department of Rehabilitation Services
- Local charitable service providers like Red Cross, Salvation Army, etc.

Information and reports will be provided to concerned partners to assist employers getting back up and operating as soon as possible.

- FEMA
- Oklahoma Department of Commerce
- Local Economic Development groups
- SBDC

**D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.**

If there is an existing petition, a pending petition or if it is suspected that a petition needs to be filed prior to a layoff, the Trade Adjustment Assistance (TAA) representative or their designee from the Oklahoma Employment Security Commission will attend the Rapid Response event explaining the benefits and services TAA will provide. The other departments and partners will still enroll the individuals for the appropriate other programs since a petition may take weeks to approve or may not be approved. While the benefits of TAA may be greater, the time limits of TAA, may be shorter than some other benefits offered.

Upon certification of a TAA petition, the state TAA Coordinator obtains a list of affected workers from the layoff employer and issues a TAA eligibility letter to each worker. The letter directs the worker to the nearest Workforce office, where they will be advised of TAA benefits and services.

If a petition is approved after the original Rapid Response event, and TAA was not fully discussed in the original Rapid Response, the Business Services representative shall host an additional Rapid Response event centered on TAA and its benefit. In all cases if the petition is approved several weeks after the original Rapid Response event, another one should be held.

When the Rapid Response occurs after the layoff, efforts will be made to contact the employees through the company, through social media, public media, and at Oklahoma Works locations. The Rapid Response meeting will be held at a suitable location like a Career Tech or some other public space.

The TAA Coordinator, the State Rapid Response Coordinator, and the Local Business Services representatives will keep each other up to date on their activities.

The TAA Coordinator and the Rapid Response Coordinator will ensure that all Local Business Services representatives fully understand TAA so they can spot companies that need a petition filed.

## **b. Adult and Dislocated Worker Program Requirements**

### **1. Work-Based Training Models**

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

Oklahoma's strategies for ensuring work-based training models are of high quality for both participants and employers include:

The implementation of a 40% minimum training expenditure rate policy to ensure more WIOA Adult and Dislocated Worker funding is directed toward quality training programs, including work-based models such as On-the-Job Training (OJT), Incumbent Worker Training, Transitional Jobs, and Customized Training directly linked to an in demand industry or occupation.

Local workforce development boards must adopt Transitional Jobs policies to identify employers who can provide quality work experiences to assist individuals with barriers to obtain unsubsidized employment, while ensuring against the displacement of employees and the use of WIOA funds to fill openings resulting from labor disputes. Local boards are encouraged to develop strategies to utilize Transitional Jobs as a gateway to unsubsidized employment for individuals who are chronically unemployed or have inconsistent work history such as: formerly incarcerated individuals; low-income individuals who must meet employment or training requirements to receive Supplemental Nutrition Assistance Program (SNAP) benefits; out-of-school youth, veterans, and other individuals with barriers to employment.

On-the-job training (OJT) continues to be a successful strategy for delivering training services through the adult funding stream, allowing businesses to provide specific job training to new employees in a normal work environment. OJT contracts take into account the quality of the employer-provided training and advancement opportunities. For example, if the OJT contract is for an in-demand occupation and will lead to an industry recognized credential. Local OJT policies ensure the duration of the training is sufficient for the participant to acquire the knowledge and skills needed to become proficient on the job, benefitting the participant and the employer. A pre-award review of the OJT contract ensures the employer has not exhibited a pattern of failing to provide trainees with continued long-term employment with wages, benefits and working conditions equal to that of regular employees.

Oklahoma's worksite agreement policy, utilized for all participants in Title I work experience programs, including transitional jobs, establishes certain assurances and conditions that must be agreed upon between the WIOA Grantee and/or Service Provider and the work experience worksite. An orientation is provided to the worksite supervisor prior to the first trainee placement at a worksite to cover a variety of topics that promote a quality workplace. The WIOA Worksite Agreement consists of three parts: The Worksite Terms and Conditions, the Trainee Work Plan, and the Trainee Timesheet. Additional attachments to the Agreement include the WIOA Work Experience Trainee Evaluation, and a Work Experience Incident Report. Oklahoma's worksite agreement forms are designed to help ensure high quality training for the WIOA participant, leading to a highly trained employee for the employer.

In October 2019, Oklahoma Office of Workforce Development (OOWD) issued guidance for Incumbent worker training (IWT). The Oklahoma IWT guidance establishes eligibility requirements for local workforce development areas to establish policies and definitions to determine which workers, or groups of workers, are eligible for incumbent worker services. Preference is given to smaller businesses with less than 50 employees, businesses located in an Opportunity Zone as defined by Oklahoma Statutes Title 68, Section 3603 Definitions, businesses located in rural counties, training for occupations on the Critical Occupations list as presented on the OOWD website, [oklahomaworks.gov](http://oklahomaworks.gov), training provided to increase employee skills as a layoff avoidance strategy, or training that leads to a significant upgrade in employee skills.

IWT is designed to increase the competitiveness of the employer by developing a highly skilled workforce that will result in increased business financial viability, stability, competitiveness, and productivity. To avert the risk of closing, IWT may be developed with a business or business association to maintain their competitive status, incorporate new technology, or prevent downsizing. Process improvements that contribute to the competitiveness and productivity of a

business are allowed as a component of IWT, when combined with training that results in new skill attainment for incumbent workers. However, training that is necessary for employers to meet federal “safe workplace” requirements, (e.g., OSHA, food handler certifications, etc.) is not considered IWT. The competitiveness of workers participating in IWT may be increased by enhancing existing skills, learning new skills, and earning employer or industry-recognized credentials, in addition to retaining employment, maintaining their careers, and/or increasing their earnings potential. An ideal IWT project allows the opportunity for employers to promote incumbent workers with increased skill levels, which creates backfill opportunities for other WIOA participants, such as less skilled or underemployed employees within the company, or for WIOA participants seeking employment.

In April 2018, the Oklahoma legislature passed Senate Bill 1171 to establish the Governor’s Council of Workforce and Economic Development as having the authority over the Oklahoma Work-Based Learning Program. The primary purpose was to create a strong work-based learning infrastructure within the state system so that work-based learning efforts are sustainable in order to meet future workforce demands. In alignment with the primary purpose, OOWD and the Oklahoma Secretary of State developed an Application Programming Interface (API) that created connectivity between the Secretary of State (SoS) webpages for Oklahoma’s Work-Based Learning Program (<https://sos.ok.gov/wlp/default.aspx>) and the OOWD website ([www.oklahomaworks.gov](http://www.oklahomaworks.gov)). Through the API, employers are able to register work-based learning opportunities and appear listed on the [oklahomaworks.gov](http://oklahomaworks.gov) website. The registration process seeks to improve the rigor, relevance and competitiveness of internship opportunities in our state, so that employers are able to find the best talent to meet their needs and interns engage in a quality learning experience. By registering, employers can align their program with industry-set standards and receive technical assistance from the Oklahoma Office of Workforce Development which can help with recruitment, marketing, program development and partnership with educational institutions.

The goals of the Work-Based Learning Program are to coordinate opportunities through the state’s labor market and exchange systems to connect youth and adults in public and private sectors; work toward increasing the number of youth and adults participating successfully in work-based learning opportunities; set standards for equal and fair access to work-based learning experiences for all Oklahomans; convene industry partners to develop industry-specific standards; promote quality and paid work-based learning experiences.

The creation of Work-Based Learning opportunities such as internships, incumbent worker training, and registered apprenticeships is aligned with the Governor’s Council for Workforce and Economic Development plan to create a well-trained workforce and increase the financial and economic opportunities for workers.

The use of Registered Apprenticeship (RA) as a work-based training model has increased significantly in the state. High quality training for both the participant and the employer is assured by the Oklahoma Office of Apprenticeship in accordance with 29 U.S. Code 50 - Promotion of Labor Standards of Apprenticeship. How RA is incorporated into Oklahoma’s workforce strategies is addressed in VI(b)(2) of this document.

## **2. Registered Apprenticeship**



Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

## **Registered Apprenticeship Strategies**

Registered Apprenticeship (RA) enables Oklahoma to prioritize education and training resources to support placement into high demand occupations through hands-on training and technical instruction while helping employers build the skilled workforce their businesses need to succeed.

Oklahoma Office of Workforce Development (OOWD) received a \$1.06 million Apprenticeship State Expansion (ASE) grant from the U.S. Department of Labor in 2019 to expand and diversify apprenticeship opportunities in Oklahoma. OOWD has developed apprenticeship outreach and communications plans to increase public awareness, conducted engagement activities with industry partners, and initiated collaborations with several businesses to explore innovative work-based learning solutions. This includes the creation of an Oklahoma Work-Based Learning Guide to explain the benefits and procedures to register apprenticeships and work-based learning programs.

Through the use of ASE Grant funds, Work-Based Learning staff will focus on creating and expanding RA opportunities within the industries that demonstrate a need for skilled workers and a high potential for growth and has set a goal to register 200 new apprenticeship programs by July 2022. These industries were identified using data from the Oklahoma Works Ecosystem Gap Analysis report published in February 2017, the Oklahoma's Talent Pipeline Report published by Oklahoma Works in May 2019, data from Emsi Labor Market Analytics and Dun & Bradstreet Econovue to identify industry sectors for outreach. Staff reviewed the skills gap, occupational growth rate, the percent of workers who are 55+ to total jobs, and the potential for opportunities for special populations based on licensing requirements and safety regulations. The nine industry sectors staff are targeting for program registration include: Finance, Public Service/Government, Retail, Child Care, Food Service, Public Utilities, Alternative Energy, Aerospace, and Health Care.

Strategies for expansion and diversification also include outreach to specific underserved populations such as women, individuals with disabilities, formerly incarcerated individuals, minorities, veterans, and out of school youth. OOWD staff are developing collaborative partnerships with the Oklahoma Department of Rehabilitative Services, the State Department of Veterans Affairs, the Oklahoma State Regents for Higher Education, Tribal Career Services, the Oklahoma Department of Career and Technical Education, and non-profit organizations to develop Registered Apprenticeship Programs targeted to non-traditional and underserved populations. OOWD has set a goal to increase the number of individuals enrolled in a registered apprenticeship program by 800 by July 2022.

## **Youth Apprenticeship Expansion**

Youth apprenticeship is a strategy for building a more inclusive economy by creating affordable, reliable, and equitable pathways from high school to good careers and college

degrees. It allows students to complete high school, start their postsecondary education at little to no cost, get paid work experience alongside a mentor, and embark on a path that broadens their options for the future. Youth apprenticeship programs equip young people with postsecondary credentials, credits, and degrees, and the work experience, mentorship, and networks they need to thrive in a rapidly changing economy. For employers, youth apprenticeship is a cost-effective talent strategy, as apprentices build skills to meet evolving business needs and contribute to their employers' bottom line.

In June of 2019, OOWD was invited to participate in the Partnership to Advance Youth Apprenticeship (PAYA) Network. The PAYA Network is a national learning collaborative designed to link dynamic, place-based partnerships that are working to launch, expand, and improve apprenticeship opportunities for high school-aged youth. Through the PAYA Network, this group of innovators will share best practices and co-develop solutions to common challenges. To support their goals, PAYA will work with network members to organize and host a range of activities including national working groups as well as virtual and in-person convenings. PAYA will also share opportunities to accelerate members' work and identify avenues to promote members' accomplishments to local, state, and national audiences.

Led by New America, the Partnership to Advance Youth Apprenticeship (PAYA) is a multi-year, multi-stakeholder initiative established in 2018 to assist innovative partners around the country in developing robust youth apprenticeship programs that can be scaled and replicated to connect the learning needs of youth with the talent needs of industry. New America created PAYA to strengthen the link between education and economic mobility. PAYA convenes experts and partners, publishes and disseminates research, supports a network of practitioners, and provides grants and direct assistance to promising youth apprenticeship programs in states, cities, and regions across the U.S. PAYA includes eight National Partner organizations from across the education, workforce, and policy sectors: Advance CTE, CareerWise Colorado, Charleston Regional Youth Apprenticeship, Education Strategy Group, JFF, National Alliance for Partnerships in Equity, National Fund for Workforce Solutions, and the National Governors Association.

### **Alignment with WIOA Services:**

There are several ways in which Oklahoma plans to utilize Title I training services in conjunction with RA programs. System integration efforts aimed at increasing the alignment of apprenticeships with workforce policy are reflected in updates to Oklahoma's Strategic Plan and Title I policies.

OOWD staff have created a referral process to refer businesses with work-based learning opportunities to local workforce boards. OOWD staff place every registered apprenticeship sponsor on the eligible training provider list once registration has been completed, this allows for increased referrals to jobseekers registering for training-related services. Additionally, OOWD is creating trainings and technical assistance webinars to support boards in the development of local apprenticeship programs and through business services. OOWD provided employer incentive grants in 2019 to encourage the development of apprenticeship programs. Employer grantees are required to work with their local workforce

development board and register and post apprenticeship opportunities on OKJOB MATCH as part of the grant requirements.

Oklahoma's Adult and Dislocated Worker Policy describes the ways in which Oklahoma plans to use training services in conjunction with RA programs, including developing an ITA for a participant to receive RA training; utilizing an OJT contract with an RA program for providing both the RTI and OJL instruction; a combination of an ITA to cover the RTI along with an OJT contract to cover the on-the-job portions of the RA. Oklahoma's policy also allows for the utilization of incumbent worker training for upskilling apprentices who already have an established working/training relationship with an RA program.

OOWD is upgrading the case management system, OKJobMatch and performance reporting systems to capture apprentice data on WIOA participants. OOWD plans to use administrative data on WIOA apprentices tracked in OKJobMatch to evaluate how development areas can better place WIOA participants into apprenticeship positions. This evaluation will inform communication strategies and processes between the OOWD and the local workforce boards and one stop shop operators on opportunities for participants and the supportive services and incentives that are more likely to assist participants in completing apprenticeship programs.

### **3. Training Provider Eligibility Procedure**

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Oklahoma's eligible training provider list (ETPL) is designed to maximize customer choice and ensure all priority groups under WIOA are served. The ETPL is administered in a manner to ensure significant numbers of competent providers offering a wide variety of training programs and occupational choices are available to customers. Oklahoma's ETPL is disseminated electronically through OKJobMatch.com.

Oklahoma's process for determining eligible training providers and programs for adults, dislocated workers, and out-of-school youth aged 16-24 includes identifying training providers whose performance qualifies them to receive WIOA training funds through Individual Training Accounts (ITAs). An eligible training provider (ETP) is the only type of entity that may receive funding for training services through an ITA. The following types of entities may qualify as ETPs:

- Institutions of higher education that provide programs leading to recognized postsecondary credentials;
- Registered Apprenticeship program sponsors, per 50 Stat. 664, chapter 663l 29 U.S.C. 50 et seq.; and
- Other public or private providers of programs of training services, which may include joint labor-management organizations, as well as eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training.

Local workforce development board (LWDBs) and/or service providers assist individuals in the selection of training programs that are directly linked to employment opportunities in their local area. Each local board must establish, maintain, review and update annually a list of existing or emerging occupations that are determined by the LWDB to:

- be part of the sector of the economy that has a high potential for sustained demand or growth in the local area;
- target industry clusters within the local area;
- support economic growth priorities; and
- address industry-specific shortages.

Based upon the initial or continued eligibility criteria listed later in this section, training providers in these occupations may be approved to provide programs of training that prepare individuals for the existing or emerging occupations determined by the LWDB.

On-the-job training, internships, paid or unpaid work experience, and transitional employment are not required to be listed on the ETPL.

### **Eligible training provider list procedure**

Training providers must apply for inclusion on the statewide ETPL through Oklahoma's virtual case management system, OKJobMatch.com. By creating an account in OKJobMatch, training providers may enter and edit information about their training institutions and the programs they offer. Once a provider applies online and is approved by the State, the local workforce board reviews the program entered by the provider and recommends approval for programs that meet local criteria and the requirements stipulated in State policy.

With the exception of Registered Apprenticeship programs, training providers must comply with the criteria, information requirements, and procedures established under WIOA Section 122 to be included on the list of eligible providers of training services. Registered Apprenticeship (RA) programs are exempt from performance and reporting-related requirements in order to enable these evidence-based programs to be placed on the statewide ETPL with minimal burden. These programs have already gone through a rigorous assessment as part of the registration process with the U.S. Department of Labor, Office of Apprenticeship (DOLETA/OA). If openings for new apprenticeships exist in the local area, the RA sponsor's programs will automatically be considered in-demand training, and will be included and maintained on the ETPL as a statewide demand occupation for as long as the openings remain unfilled.

### **Initial Eligibility**

New training providers may seek initial eligibility electronically through OKJobMatch. Approved providers will remain eligible and listed on the ETPL for only 1 year for a particular program. After the first year, if the provider/program meets subsequent approval requirements, continued eligibility will be reviewed every two years. The criteria and information requirements established by the OOWD require a provider and/or program to provide verifiable information pertaining to:

- A detailed description of each program of training to be offered;

- Program-specific performance related to the indicators of performance;
- A description of the provider's partnership with at least one business, if such partnership exist;
- Other factors that indicate high-quality training services, such as accreditation, registration and /or state licensing requirements specific to the industry, and whether the training leads to a recognized postsecondary credential;
- Information addressing the alignment of the training services with in-demand industry sectors and occupations, to the extent practicable, as evidenced by the Occupational Information Network Standard Occupation Classification (O\*NET-SOC) code(s); and
- Program-specific data for the All Student population, i.e., the general public who attended the training program for the most recent performance year, including:
  - the number of persons who entered and attended at least one day of training during the performance year; the number of persons who completed the training program during the performance year;
  - the number who obtained training-related employment upon completion of the training program during the performance year; and
  - the average hourly wage at employment placement.

The ability for ETPs to upload documents to OKJobMatch was made available in December of 2017. The number of private vocational schools that have uploaded documentation pertaining to approval, licensing or registration from their oversight organization or agency continues to increase as new training facilities are added to the ETPL. This process helps to ensure quality training providers and programs for individuals seeking training. State Institutions of Higher Education are not required to upload proof of accreditation but are required to list their accrediting agency in the initial application.

The new ETPL policy (anticipated to be released in Quarter 3 of PY19) will include language to require documentation of a prospective ETP's financial sustainability prior to initial approval. This requirement is intended to help to ensure quality training providers and programs.

### **Continued (Subsequent) Eligibility**

The following factors must be considered by Local Workforce Development Boards (LWDBs) when electronically recommending subsequent eligibility approval to the State:

- The specific economic, geographic, and demographic factors in the workforce areas in which providers seeking eligibility are located;
- The characteristics of the population served by providers seeking eligibility, including the demonstrated difficulties in serving such populations, where applicable;
- The degree to which training programs relate to in-demand industry sectors and occupations within the state;
- The performance of a provider of program(s) of training services as outlined by the Oklahoma Office of Workforce Development;
- The program cost of training services; and
- The involvement of employers in the establishment of skill requirements for the training program.

After the first year, if the program meets subsequent approval requirements, continued eligibility is reviewed every two years. Program-specific performance (number participated, number completed, number employed after leaving the program, credentials attained, median and average earnings) pertaining to the All Student population must, at a minimum be entered biennially by the training provider (or by their oversight agency through a data exchange process) for each training program. Local workforce boards will no longer be able to require training providers to update information more frequently once per year, provided the information is accurately submitted. All Student and WIOA performance data will be captured through OKJobMatch and reported to ETA via the Workforce Integration Performance System (WIPS).

Additional factors that must be considered by local workforce boards prior to the electronic submission of training programs to the State for subsequent approval, include:

- Specific economic, geographic and demographic factors in the workforce area in which the providers seeking eligibility are located;
- Characteristics of the population served by providers seeking eligibility, including the demonstrated difficulties in serving such populations;
- The degree to which training programs relate to in-demand industry sectors and occupations within the state;
- The performance of the provider's training programs, based on established benchmarks for program completion, entered employment, and wages at employment placement;
- The program's cost of training;
- The involvement of employers in the establishment of skills requirements for the training program; and
- The impact provider performance will have on State-negotiated WIOA performance measures for all program participants.

Note: Oklahoma has established MOUs with the Oklahoma State Regents for Higher Education (OSRHE) and the Oklahoma Department of Career and Technology Education (ODCTE). The purpose of the agreements are to request records of students in career and technology education institutions so OOWD may:

- Utilize the information obtained from the state agencies in generating an Eligible Training Provider List in compliance with the Workforce Innovation and Opportunity Act ("WIOA") and in accordance with 20 CFR §680.460.
- Utilize the information obtained to complete the annual Eligible Training Provider performance report in accordance with WIOA section 116 and 20 CFR §677.230.

Oklahoma is in the process of re-evaluating the State's current performance benchmarks for ETPL eligibility, based on the guidance received from the USDOL in August 2018 and the ETPL Reporting webinars held in September and October of 2018. Oklahoma continues to explore solutions to lessen the annual reporting burden on ETPs and on the local workforce boards, through the aforementioned MOUs and by reducing the initial eligibility requirement from all four indicators of performance currently required to only one indicator of performance. Subsequent eligibility requirements will also be re-evaluated with the aid of the State entities responsible for oversight of the training providers, including ODCTE, OSRHE and the

Oklahoma Board of Private Vocational Schools (OBPVS). Eligible Training Providers (ETPs), with the exception of registered apprenticeships, are required to submit annual performance reports. The results will apply to both WIOA and All Student populations. The mechanism for collecting the All Student performance information is anticipated to be in place by end of calendar year 2020.

The current performance requirements for eligible training providers, with the exception of Registered Apprenticeships, are:

- Entered Employment Rate: The percentage of program participants who are in unsubsidized employment in the second quarter after exit from the program;
- Employment Retention Rate: The percentage of program participants who are in unsubsidized employment in the fourth quarter after exit; and
- Median Earnings: The median earnings of program participants who are in unsubsidized employment during the second quarter after exit.

Oklahoma anticipates having a new ETPL policy released in the third quarter of PY19 that will include the changes outlined in this section.

### **Conditions for Removal from the ETPL**

The State may remove a program or programs from the list for failing to meet the established criteria or for not providing all required performance information for subsequent eligibility. Removal is also appropriate if the program has failed to attain or has lost the accreditation required for professional licensure. A training provider that is removed from the list for reasons stated above may reapply for continued eligibility when they can demonstrate that they meet all requirements. Any providers that willfully supply false performance information, misrepresent costs or services, misrepresents their financial stability relating to the ability to provide training services, or substantially violate requirements of WIOA law will be removed from the ETPL by the State for a period of not less than two years. Providers are liable to repay all adult, dislocated worker, and youth funds received during the period of non-compliance. No training provider debarred by the Federal Government may be permitted to be placed or remain on the ETPL. In the case of a training provider or a program of training services that is removed from the list while WIOA participants are enrolled, the participants may complete the program unless the provider or program has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency. This section does not apply to Registered Apprenticeship programs, whose registration status is required to be assessed by the OOWD on a biennial basis at a minimum.

### **Appeal Process**

Training providers can choose to appeal the rejection of their program for inclusion on the ETPL, or its subsequent termination of eligibility. The appeal must be submitted in writing via email to OOWD within 14 days after notification of the decision. The appeal must include the justification for the appeal in the request. The provider must also have the right to request a hearing to discuss their appeal. If a hearing is requested, a board will be convened consisting of OOWD management, the OOWD ETPL Administrator, and the LWDB Director. A decision will

be made within 60 days of appeal. This will be a final decision and, if the removal is upheld, the program will be prohibited from reapplying for one year from the date of the final decision or for two years if the removal was for submittal of false information.

### **State ETPL Responsibilities**

OOWD is responsible for:

- The development, maintenance and dissemination of the State list of providers and programs;
- Ensuring programs meet the eligibility criteria and performance levels established by the State;
- Verifying the accuracy of submitted information;
- Removing programs that do not meet established program criteria or performance levels;
- Ensuring performance and cost information relating to each provider is available to the public;
- Finalizing approval for providers and programs recommended by the Local Workforce Development Boards (LWDB);
- Ensuring Registered Apprenticeship program sponsors are contacted to voice their willingness to be part of the ETPL (with assistance from DOLETA/OA);
- Verifying the registration status of Registered Apprenticeship programs on at least a biennial basis; and
- Ensuring new Registered Apprenticeship programs are placed on the ETPL in a timely manner.

### **Local Workforce Board ETPL Responsibilities**

The LWDB is responsible for carrying out the following procedures assigned by the State:

- Identification of in-demand sectors or occupations for the local area using relevant labor market information;
- Reviewing new and subsequent training providers and programs of training services to ensure accurate eligibility criteria and performance information has been provided prior to submission to the OOWD for final approval;
- Recommending the termination of providers due to the provider's submission of inaccurate eligibility and/or performance information;
- Working with the State to ensure that sufficient numbers of providers of training services have the expertise in assisting individuals with disabilities and training providers are available to assist adults in need of adult education and literacy activities; and
- Making recommendations to OOWD for approval or denial of providers and/or programs based on the local area's demand occupation information and the program's performance.

With the exception of Registered Apprenticeships, LWDBs may require additional information and/or set higher levels of performance for providers to become or remain eligible for provider services in their particular area. If a Local Board establishes minimum standards in local policy, the Local Board may direct the removal of a provider's program from the eligible programs in



that local area for failure to meet established criteria. The appeal process outlined in this section must be followed for rejected training providers or those providers removed for cause.

**4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.**

Oklahoma's Adult and Dislocated Worker policy addresses the priority requirements of WIOA sec. 134 for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. As with all DOL-funded job training programs, veterans and eligible spouses continue to receive priority of service for individualized career services and training services authorized under WIOA Chapter 3 sec. 134(c). Due to the statutorily required priority for Adult funds, the following priority of service requirements must be adhered to by local workforce development boards (LWDBs) regardless of the level of Adult Formula funds received:

- First, to veterans and eligible spouses who are recipients of public assistance, or who are determined to be other low-income individuals, or individuals who are basic skills deficient.
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are public assistance recipients, determined to be low-income, or are basic skills deficient.
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth, to priority populations established by the LWDB.
- Last, to non-covered persons outside the groups given priority under WIOA.

The Southern Workforce Development Board has determined a fourth priority population group for individuals residing within the Choctaw Nation of Oklahoma, established as a Promise Zone in 2014. The 12 county area is considered a highly impoverished area. At this time, the Southern Board is the only LWDB that has established a fourth priority population group.

Local areas are required to establish written policies and procedures to ensure priority for the populations described above. As part of regular monitoring and oversight responsibilities, OOWD ensures that all local areas have developed and implemented such policies and follow the state's Individual Employment Plan (IEP) policy that requires the development of an IEP that targets the specific needs of each individual determined eligible for Adult and Dislocated Worker program services. OOWD requires the IEP, which is entered into the virtual case management system (OKJobMatch), to identify the appropriate combination of services needed to achieve each participant's employment goals, and describe how and when those services are or have been provided. This process helps to ensure the needs of priority populations, especially those who are low-income and/or have been determined to be basic skills deficient, are addressed.

## **5. Describe the State’s criteria regarding local area transfer of funds between the adult and dislocated worker programs.**

The Oklahoma Office of Workforce Development (OOWD) allows a local board to transfer up to 100 percent of the fiscal year funds allocated to the local area for adult and dislocated worker employment and training services between the Adult Program and Dislocated Worker Program.

In an effort to ensure services are available to adults and dislocated workers, each local area must consider how adjusted levels of performance for the primary indicators will be met before requesting such a transfer. A rationale for the transfer of funds between the programs must address the impact on jointly funded employment and training programs, the usage of the funds to be transferred, and the consistency of usage with the local strategic plan. Rationales must also include justifications for the transfer supported by local data, including the number of TAA petitions and Rapid Response events in the local area, anticipated layoffs based on local economic conditions, and current and predicted program performance.

Local areas must also guarantee the transfer of funds will not unfavorably impact: (1) the employment and training activities of the program that funds are being transferred from; (2) the program that funds are being transferred to; and (3) The WIOA Title I performance measures for the WIOA Adult or Dislocated Worker programs.

### **c. Youth Program Requirements**

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

#### **1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.<sup>11</sup>**

The state developed criteria for local boards to utilize in awarding grants for youth workforce investment activities is Oklahoma Workforce Development Issuance 10-2017 “Fiscal Requirements, Procurement, and Contracting.” Local areas must also follow the procurement requirements in the Uniform Code at 2 CFR 200.320.

The local board will evaluate the ability of the solicited contractors to deliver the full array of youth services within the workforce development area. Ability/experience normally includes a background in service provision within WIOA programs including experience in making performance measures and a track record in meeting or exceeding mandated performance criteria. All local areas must explain how the 14 WIOA youth program elements will be available to youth on an as needed basis and must include the elements in their procurements.

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<sup>11</sup> Sec. 102(b)(2)(D)(i)(V)

EXCEPTIONS.—A local board may award grants or contracts on a sole-source basis if such board determines there is an insufficient number of eligible providers of youth workforce investment activities in the local area involved (such as a rural area) for grants and contracts to be awarded on a competitive basis : “Sole source procurement” occurs when one of these circumstances apply:

- The item or service is available from only a single source.
- An emergency situation that will not permit the time required for a competitive solicitation exists.
- After solicitation from a number of sources, competition is determined inadequate.

**2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.**

The State expects Workforce Development Boards to focus a higher percentage of Out-of-School Youth (OSY) Funding on direct costs to OSY since this population of youth is more difficult to locate, engage, and will potentially require a longer range of services to be successfully served. We also expect as a result of higher expenditure requirements of OSY funds:

- Increased collaboration amongst core partners through sharing of costs and information to ensure that youth have access to all available clusters of needs based services.
- A focus on forming and/ or improving alliances with the Department of Education, Pre-Apprenticeship Programs, Employers, Training Providers as well as Community Based Organization which have traditional connections to disconnected youth.
- Greater disseminating of documented strategies/models amongst Workforce Development Boards that demonstrate success in locating and engaging eligible youth. The state will also support this practice by adopting best practices demonstrated by local partners and/or agencies and other nationally recognized programs that have successfully served similar populations of youth with state, federal or other limited funds.
- We will continue our relationship with the Central Oklahoma Juvenile Center (COJC). As a result of the initial relationship built and promising outcomes demonstrated in the career service pilot, COJC and Central Oklahoma Workforce Innovation Board are optimistic that moving forward under the current administration, we will see a significant increase in servicing of the youth at the facility due to COJC transitioning to a fully functioning Co-Ed facility which has significantly increased the sites total capacity since both male and females are now housed at the Center.

The Oklahoma Office of Workforce Development has developed relationships with the Boys and Girls Club Alliance and will continue our strategy meetings that evolved to eventually include local input for the sake of building a framework for partnering to serve Club Kids in the Oklahoma Works Centers as well as a referral process for directing in-school youth to the local clubs for services. This relationship also resulted in LWDB staff attending focus groups with specific club kids to provide outreach on what workforce offers and it provided the club kids an

opportunity to provide feedback on facilities and activities they wanted to see introduced to the clubs or improved.

The Oklahoma Office of Workforce Development submitted the Youth Cohort Challenge Application in support of Central Oklahoma Workforce Innovation Board and its selected group of partnering organizations including; Dynamic Workforce Solutions, Oklahoma County Juvenile Bureau, Oklahoma City Housing Authority, and the Office of Juvenile Affairs. The U.S. Department of Labor Employment and Training Administration selected the state partnership along with seven other partnerships nationwide to participate in the Administration's Youth Cohort Challenge - What Does It Take to Effectively Engage and Retain Out-of-School Youth Throughout the Program Lifespan?

#### Key Results from the cohort study:

Having cohort teams from different local entities on the team was an opportunity to develop new programming and practices:

- Several teams met in-person and used the time before and after the webinar to meet
- Teams thought about how they could improve communication in the future
- Teams thought about how they could leverage additional local partnerships or create new ones
- Certain program topics surfaced as warranting further exploration locally
- Assessment as a critical point of engagement
- Using technology or using it more in programming
- Peer centered approaches to programming
- Hearing other teams' best practices of what went well was helpful, but so were the lessons learned from what didn't work out as well
- Lower unemployment in many areas has allowed youth to obtain jobs faster but youth as a demographic still struggle when employers want highly skilled or semi-skilled workers
- Engaging youth in credentialing and career pathway opportunities has become more challenging

The State is focussed on its partnerships with Vocational Rehabilitation to provide transition services to youth with disabilities to ensure high school completion. Local boards will be asked to describe these proposed partnerships in their local plans.

As youth enrolled in a High School Equivalency program are considered out of school and dropouts, many of the obstacles related to perfecting eligibility under WIA for out of school youth are no longer present under WIOA. Similar to Vocational Rehabilitation, local boards will be encouraged to work with their local HSE providers. By reviewing the plans of Adult Education and Family Literacy Act providers, local boards will also have an opportunity to drive performance toward those established for youth in the WIOA programs further enhancing coordination efforts. The state will continue to direct local staff to utilize a portion of the 75% out-of-school youth funding on re-engagement strategies and program related transitional planning for reconnecting disconnected youth to the education and workforce system. Our focus is on:

- Championing these high priority youth receiving industry recognized occupational skills credentials.
- Reinforcing the needs for dropout recovery programs, and;
- Reiterating the need to incentivize participation and monumental achievements of the youth for retention purposes.
- Recommending and supporting the relationship with community agencies and In-kind resources to leverage the costs of serving these youth.

**3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element.**

- Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential:
- Alternative secondary school services, or dropout recovery services, as appropriate:
- Paid and unpaid work experiences that have academic and occupational education as a component of the work experience:
- Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in- demand industry sectors or occupations in the local area involved, if the Local WDB determines that the programs meet the quality criteria described in WIOA sec. 123:
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster:
- Leadership development opportunities, including community service and peer- centered activities encouraging responsibility and other positive social and civic behaviors:
- Supportive services, including the services listed in § 681.570:
- Adult mentoring for a duration of at least 12 months that may occur both during and after program participation:
- Follow-up services for not less than 12 months after the completion of participation, as provided in § 681.580:
- Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth:
- Financial literacy education:
- Entrepreneurial skills training:
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services:
- Activities that help youth prepare for and transition to postsecondary education and training:

The current youth policy also addresses each of the 14 program elements in detail and the state has set the elements as Service Delivery requirements in accordance with the WIOA statute;

provided definitions of each element in detail in policy, and we also in policy have provided Oklahoma Service Link uploading, data entry and source documentation requirements to ensure that our local boards have the technical resources needed to successfully apply these elements.

Our local boards have been made aware through our policy and monitoring component that the discretion to determine what specific program services a youth participant receives is based on each participant's objective assessment and individual service strategy (ISS).

Technical assistance has also been provided in policy and the monitoring component that our local programs staff are not required to provide every program service to each participant. Again, provision of the required elements is based on the objective assessment and ISS.

We have advised our local boards of the necessity of consorting and will continue to support local partnering with authorized and proven organizations capable of providing the elements. The goal is to introduce youth to outlets to aid them in graduating from high school and venturing into postsecondary education.

The state expects the providers of youth elements to evolve into the process for the purpose of providing specific elements via WIOA funding and leveraged funds and agreement or referral to a provider of the unique services. Examples of these providers are the public school system, youth based contractors, nonprofit organizations such as Habitat for Humanity, Salvation Army and the Urban League, Career Tech & Community Colleges, State Housing Agencies, YMCA and civil authorities.

**4. Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.**

The State policy OWDI 02-2016 Change 2 defines the criteria for an out-of-school youth who needs additional assistance as a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment as follows:

- A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
- A youth with a parent or legal guardian who lacks a high school diploma or GED;
- A youth who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the Oklahoma State Department of Education website <http://sde.ok.gov/sde/priority-schools>;
- A youth between 18-24 years of age with a pattern of Poor Work History. Poor work history includes non-reoccurring employment income and sporadic employment.

The State policy OWDI 02-2016 Change 2 defines the criteria for an in-school youth who needs additional assistance as a low-income individual who requires additional assistance to complete an educational program or to secure or hold employment as follows:

- A youth with a parent or legal guardian that is currently or previously incarcerated for a felony conviction;
- A youth with a parent or legal guardian who lacks a high school diploma or GED;
- A youth who attends or has attended chronically under performing schools listed as a priority or targeted intervention school on the Oklahoma State Department of Education website <http://sde.ok.gov/sde/priority-schools>;
- A youth between 18-21 years of age with a pattern of Poor Work History. Poor work history includes non-reoccurring employment income and sporadic employment.

**5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define “not attending school” or “attending school,” indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.**

Attending School under WIOA is defined as a youth not younger than 14 years of age, nor older than 21 years of age and attending any school recognized under Oklahoma Law.

Similar to the WIOA definition, which defines a dropout under the age of mandatory attendance to be a youth who has not attended for a full term or semester, in Oklahoma “school dropout means any student who is under the age of nineteen (19) and has not graduated from high school and is not attending any public or private school or is otherwise receiving an education pursuant to law for the full term the schools of the school district in which he resides are in session.”

Further in Oklahoma, youth in High School Equivalency programs are considered both out of school and dropouts.

There is one exception to age eligibility for youth attending school. Youth with a disability who have an Individualized Education Program (IEP) may be enrolled as ISY after the age of 21. This allows youth with disabilities to be served by the K-12 public school system beyond the age of 21. Such youth may only be enrolled as ISY up to the age allowed by Oklahoma Law Section 168. Student of Legal Age- Completion of Twelfth Grade to receive secondary education services.

**6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.**

The State of Oklahoma uses the WIOA definition of Basic Skills Deficient.

#### **d. Single-area State Requirements**

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

- 1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)**
- 2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)**
- 3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)**
- 4. A description of the roles and resource contributions of the one-stop partners.**
- 5. The competitive process used to award the subgrants and contracts for title I activities.**
- 6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.**
- 7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.**
- 8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.**

#### **e. Waiver Requests (optional)**

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

- 1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan.**



**2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers.**

**3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted.**

**4. Describes how the waiver will align with the Department's policy priorities, such as:**

- a. supporting employer engagement;
- b. connecting education and training strategies;
- c. supporting work-based learning;
- d. improving job and career results; and
- e. other guidance issued by the Department.

**5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and**

**6. Describes the processes used to:**

- a. monitor the progress in implementing the waiver;
- b. provide notice to any local board affected by the waiver;
- c. Provide any local board affected by the waiver an opportunity to comment on the request;
- d. Ensure meaningful public comment, including comment by business and organized labor on the waiver;
- e. collect and report information about waiver outcomes in the State's WIOA Annual Report.

**7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.**

## **Title I-B Common Assurances**

The Unified or Combined State Plan must include assurances that—

- 1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;    Yes

2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs; Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2); Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership; Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions; Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7); Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan; Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report; Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor. Yes

## **Wagner-Peyser Act Program (Employment Services)**

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

## **a. Employment Service Professional Staff Development.**

### **1. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.**

As the administrative agency for Wagner-Peyser, the Oklahoma Employment Security Commission (OESC) supports the professional development of staff. Training personnel, business services representatives, and program subject matter experts work together to meet the training demands of the workforce system customers, managers, and staff.

OESC understands the importance of continuous improvement and meets quarterly to determine training needs, a review of national program requirements, system and procedure matters, and other service delivery development opportunities.

OESC believes strongly in the WIOA partnership and sends staff to annual partner conferences and other state or national opportunities to learn about and weigh in on critical system initiatives. We will continue to review and strengthen our professional development approach and customer product box so staff will be best positioned to provide adequate resolution at the first point of customer contact.

### **2. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program, and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.**

The Oklahoma Employment Security Commission (OESC) is a very active, involved partner in the delivery of services in the Centers. In Oklahoma, both the Unemployment Insurance (UI) and Wagner-Peyser/Employment Services (ES) programs are administered by OESC. As an agency, they have approached service delivery to customers by cross-training agency staff, both ES and UI staff, as well as Partner staff, on these two major Federal programs.

The following types of training have been and will continue to be provided to Center staff to assist with identification of potential UI eligibility issues and referral to UI for adjudication:

1. What kinds of issues create eligibility problems for those claimants receiving UI? Some of the common UI issues covered in training: a) Ability to work; b) Availability to seek and accept work; c) Refusal of a job referral; d) How to report acceptance of employment; and e) Failure to report for a scheduled, required reemployment session.
2. What kind of information is important to gather when it comes to “fact-finding” about potential UI issues? Some of the common topics covered in training: a) Instruction to all staff on how to conduct quality fact-finding when taking statements for UI purposes; and b) Instruction on how to add issues to or report issues about claims so they will be assigned to an Adjudicator for further investigation and subsequent determination.
3. What are the processes for reporting of issues and subsequent Adjudication procedures?
  - a) Information about reporting potential issues to UI staff such as using specified forms and emailing specified departments;
  - b) Information on the Adjudication processes for

reemployment services such as call-ins being sent to obtain claimant information when the claimant fails to report, when denials are issued on a claim, length of disqualifications; etc. c) Information on the process to be followed when a claimant reports to a required reemployment service after a disqualification has been issued.

In addition, reference material is provided to Center Staff and One-Stop Operators and/or Managers provide supplemental training to an integrated staff through weekly Center meetings. This detailed approach fosters an environment for knowledge growth and continues to keep Oklahoma focused on service delivery as defined by WIOA.

**b. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through One-Stop centers, as required by WIOA as a career service.**

Oklahoma has twenty-nine (29) Centers – ten (10) Comprehensive centers and nineteen (19) Affiliate Centers, all part of the American Job Center network, which provide an array of career and training services as well as the best upfront information to file their initial Unemployment Insurance (UI) claim and provide meaningful assistance the first time a customer accesses the center.

Oklahoma continues its support of unemployed individuals by providing trained, knowledgeable, integrated staff members to help the customer through the claims filing process while still leveraging technology. OESC has transitioned all initial unemployment insurance claims to an online platform in an effort to ensure more meaningful assistance is provided through support staff throughout the America Job Centers in Oklahoma. Meaningful assistance applies in every scenario where we communicate and provide services to an unemployed individual:

- 1) Informing claimants of their right to an Appeal. This may also include showing the claimants where/how to file.
- 2) Providing resume assistance and/or guiding the claimant through their responsibility to register for work – Staff may provide the customer with step-by-step guidance on the OKJobMatch resume builder and/or help the claimant create a resume appropriate for upload. Any resume service should result in one or more soft or hard copy resume options of superior quality.
- 3) Informing claimants of their right to receive (and signing them up for) other reemployment services such as the various job seeker skills development workshops or working with the claimant to create a detailed reemployment plan.

- 4) Giving the customer information about their responsibility to search for work including where to find and how to fill out their work search log and/or advising customers on what constitutes an allowable work search item.
- 5) Informing the customer about their responsibility to keep all scheduled appointments and return all requested documentation.
- 6) Guiding the claimant through LinkedIn registration or other appropriate social media and job search tools that aid them in performing their work search responsibilities. In addition, ensuring claimants take advantage of getting OKJobMatch notifications of available jobs.
- 7) Assistance with the filing of initial or weekly claims. This means sitting down with the customer and walking them through the Online Network Initial Claims (ONIC) online filing tool and pointing out the various self-service information options available to them.
- 8) Informing the customer about their responsibility to accept offers of suitable work.

For those claimants who are Limited English Proficient, staff use Language Associates Inc. to assist the customer during the claims filing process. OESC has also enhanced our Interactive Voice Response (IVR) system to include Spanish and Vietnamese translations. For those individuals who are deaf or hard of hearing, TTY services are also available.

The rapid reemployment of claimants and job seekers alike remains a focal point and OESC and its partners continue to strategize staff training opportunities and improvements on service delivery.

Oklahoma continues its support of unemployed individuals by providing trained, knowledgeable, integrated staff members to help the customer through the claims filing process while leveraging technology. OESC has transitioned all initial unemployment insurance claims to an online platform in an effort to ensure more meaningful assistance is provided through support staff throughout the America Job Centers in Oklahoma. Meaningful assistance applies in every scenario where we communicate with an unemployed individual with the following staff assisted services:

- 1) Informing claimants of their right to an Appeal. This may also include showing the claimants where/how to file.
- 2) Providing resume assistance and/or guiding the claimant through their responsibility to register for work – Staff may provide the customer with step-by-step guidance on the OKJobMatch resume builder and/or help the claimant create a resume appropriate for upload. Any resume service should result in one or more soft or hard copy resume options of superior quality.

- 3) Informing claimants of their right to receive (and signing them up for) other reemployment services such as the various job seeker skills development workshops or working with the claimant to create a detailed reemployment plan.
- 4) Giving the customer information about their responsibility to search for work including where to find and how to fill out their work search log and/or advising customers on what constitutes an allowable work search item.
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- 7) Assistance with the filing of initial or weekly claims. This means sitting down with the customer and walking them through the Online Network Initial Claims (ONIC) online filing tool and pointing out the various self-service information options available to them.
- 8) Informing the customer about their responsibility to accept offers of suitable work.

For those claimants who are Limited English Proficient, the online claims system has a language translator. Center staff can assist the customer in accessing the translator or use language lines to assist such individuals during the claims filing process. OESC has also enhanced our individual voice response system and Spanish and Vietnamese translations available. For those individuals who are deaf or hard of hearing, TTY services are also available.

The rapid reemployment of claimants and job seekers alike remains a focal point and OESC and its partners continue to strategize staff training opportunities and improvements on service delivery.

### **c. Describe the state's strategy for providing reemployment assistance to Unemployment Insurance claimants and other unemployed individuals.**

In addition to other career services in the Oklahoma Works centers, Oklahoma provides Reemployment Services and Eligibility Assessment services to help Unemployment Insurance (UI) claimants and/or unemployed individuals return to work more quickly.

#### **Reemployment Services and Eligibility Assessment (RESEA)**

RESEA is an individualized process consisting of an introduction to the Center and all available workforce system resources, a UI eligibility review, an assessment of a claimant's skills and career goals including any necessary transferable skills discussions, a discussion of job search strategies, the establishment of an individual reemployment plan, provision of job referrals, and follow-up appointments. This program addresses the "harder to serve/need intensive" category i.e. those with multiple barriers to employment needing a variety of assistive services to return to

work. RESEA claimants have been identified as likely to exhaust UI benefits and unlikely to return to their previous occupation; therefore, they must be scheduled before receiving the 5th week of UI benefits. Additionally, RESEA also serves Unemployment Compensation for ex-service members (UCX) claimants. These reemployment services are provided in an effort to reduce the time a claimant will be paid UI benefits and increase the likelihood the claimant will attain self-sufficient employment.

OESC is currently making policy revisions with some changes that will include: adding a work search review process, the flexibility to provide services to claimants at locations outside of the AJC, allowing the use of online or self-directed individual reemployment plans, eliminating the AJC orientation presentation and making use of a brochure the claimant can access later, and referring all claimants to the appropriate programs according to their needs. In an effort to take advantage of the flexibility the grant offers and enhance access points for customers a pilot project was launched in the summer of 2019 with the Elk City Library. Customers in this rural area will have access to unemployment insurance and career services outside of the American Job Center.

Another tool to utilize with unemployed individuals is the My Reemployment Plan (MRP).

The “My Reemployment Plan” template is a generic, interactive job search guide, i.e., a “road map” of sorts that can be adapted to the specific requirements and various economies of states and regions. It outlines proven steps to successful reemployment in a 21st century job market and may be used by jobseekers directly or as a case management tool for professional workforce development staff.

The MRP was developed by National Association of State Workforce Agencies Information Technology Support Center (ITSC) and started out as a paper tool for Unemployment Insurance (UI) claimants. After many meetings and with substantive feedback from the states, the tool evolved and is now an online set of reemployment modules designed not just for UI claimants, but for any job seeker who may want to re-tool and prepare a plan for returning to work. The MRP starts with a short inventory of ‘why you are here or what do you need’ statements; each leading the job seeker to learning modules with related activities. The modules cover a range of topics from: Developing a Plan and Analyzing Your Values and Interests to Creating an Effective Resume and Online Job Search and Job Applications. Job seekers can upload resumes, save employer and other professional contacts, record weekly work search efforts for UI, and record notes. In addition, individuals are able to access telephone, address, and website information for each workforce office in Oklahoma as well as other state and community partners. Two of the major advantages of the MRP are: 1) Job seekers can conveniently access their plan, activities and information from ANY computer that is connected to the internet; and 2) Job seekers can share their plan with workforce professionals at any point during their reemployment journey. This means reducing the potential duplications and streamlining the service delivery for Oklahoma’s workforce.

OESC’s IT department continues to work closely with ITSC in customizing the tool and making it available for job seekers in Centers across the state. Prior to going live and in partnership with Maher and Maher, OESC held focus groups with end-user customers such as job seekers, mobile users, UI claimants, and frontline staff. OESC recruited participants and handled the logistics while Maher and Maher facilitated the groups. The team gathered feedback from end-user customers related to the following concepts: General utility (in comparison to existing resources, if any); Ease of (intuitive) navigation;

User-friendliness of activities; and Integration with existing systems. My Reemployment Plan launched last year and is available to all unemployment insurance customers in Oklahoma.

As a companion to the My Reemployment Plan guide, an animated video series has been created to aid job seekers with the steps involved in their job search. From setting goals to having a successful interview, these videos highlight important reemployment topics and correspond to sections within the My Reemployment Plan. The videos include 1) Introduction to My Reemployment Plan; 2) Setting a Plan; 3) Analyzing Your Values and Interests; 4) Assessing Your Knowledge, Skills, and Abilities; 5) Career Exploration; 6) Creating an Effective Resume; 7) Online Job Search; 8) Job Applications; 9) Tapping Your Network; 10) Online Professional Networking; 11) Employment Agencies and Recruiters; 12) Informational Interview; 13) Acing the Job Interview; 14) American Job Centers; 15) Reemployment Efforts & Unemployment Insurance

**d. Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate, including the following:**

**1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;**

The Oklahoma Employment Security Commission (OESC) complies with this requirement to use Wagner-Peyser funds to support UI claimants. In Oklahoma both the Unemployment Insurance Program and Wagner-Peyser are administered by the same agency, OESC. Labor exchange services are provided to all customers accessing the workforce centers by Wagner-Peyser staff. In fact, there is a special emphasis placed on serving UI claimants to help connect them back to work as quickly as possible.

**2. Registration of UI claimants with the State's employment service if required by State law;**

In Oklahoma claimants must register for work in the state labor exchange system within seven days of filing their initial claim. Claimants are informed both when they file online and when they file via the Interactive Voice Response (IVR) system that they must complete the registration for work within the seven-day requirement. If a claimant does not comply with this requirement, benefits will not be awarded until the requirement has been met.

**3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and**

Claimants in Oklahoma must now file their initial claims online via the Oklahoma Network Initial Claims (ONIC) system; however, they may file their continued weekly claim to receive benefit payment by telephone via the Interactive Voice Response (IVR) system or online.

Oklahoma has enhanced its online services to include robust service delivery around unemployment claims. The online service options for claimants are: 1) File your initial claim;



2) File your weekly claim for benefit payment; 3) Inquire on an existing claim; 4) Request a 1099; 5) Change your contact information i.e. address, phone number, and email; 6) Change your PIN; and 7) File your appeal. Claimants can also access frequently asked question documents, appeal information, the Reemployment Assistance for the Unemployed booklet, the work search form, and critical information about their debit card.

Through both of these filing processes, potential eligibility issues are identified based upon the claimants' response to questions during the application for benefits process.

Reemployment of claimants continues to be a priority for Oklahoma. OESC has modified and enhanced services to claimants to ensure the registration for work requirement is met along with required attendance at and completion of other reemployment assistance services. UI claimants receive reemployment information throughout their claims process to include but not limited to; information of available services in Oklahoma Works Centers, resume assistance, job referrals, job search workshops, work search review and access to skills based training. Regardless of the point of entry for the claimant, the end result continues to be reemployment.

#### **4. Provision of referrals to and application assistance for training and education programs and resources.**

Within the Oklahoma workforce development system, known as Oklahoma Works, is a network of Centers or One-Stop offices where employment, education and training providers are integrating services to assist both job seekers and employers. Job Seeker customers receive assistance preparing for and searching for work, making career decisions, and accessing training opportunities.

Most people who walk into an Oklahoma Works Center are in search of information such as where the job openings are located, what training opportunities exist, or what kinds of community services are available. They may also be in need of a computer, phone, or fax.

These core services are available to everyone through the Centers, usually with limited assistance. In fact, there are full-service, comprehensive "Resource Rooms" set aside for self-help, or limited assistance, much like a community library. There are computers and software for customers to prepare a resume, for instance, with books, videos, and even staff nearby to answer basic questions or give limited guidance.

During center orientations, customers receive information regarding workforce services, programs, and partner resources. This includes information about internal and external training and educational programs, including referrals to WIOA. Customers have access to resources and handouts. Online, customers may research information about different training programs within their community, statewide, and nationally. Oklahoma Works Center representatives provide individualized information and resources that assist the customer in making the most informed choice.

For those individuals who require more in-depth assistance, Oklahoma requires applicants to complete questionnaires which will assist us in determining what services will best fit the customer's needs and which agencies or partners will be best equipped to fill such needs. The

customer and the Center staff will discuss items like background, education and/or certifications, experience and work history, skills, etc. and then map out a strategy to get the customer on a career or training path. The information that is obtained creates a “snapshot” of potential program eligibility thus allowing Center staff to make proper referrals to additional programs or resources.

## **1. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include--**

### **1. Assessment of Need**

*Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.*

In Oklahoma, 2% of all farms and ranches hire migrant workers. A total of 858 migrant workers were reported by the 2012 USDA, Census of Agriculture for Oklahoma. Other sources give estimates as high as approximately 8,000 MSFWs in the state, not including their family members. The discrepancy of available data makes it difficult to identify true number of MSFWs in the state and where they are located. It is anticipated that the number of migrant workers will continue to range between 800-1,000 workers in the future for Oklahoma. However, data from O\*NET Online, gives an average increase of 1-3% per year for all MSFWs, so there may possibly be a slight increase in numbers.

Oklahoma continues to seek identification of and contact with the changing face of its migrant and seasonal farmworker (MSFW) population. The increasing changes in agricultural based technology and mechanization, along with the second worst drought period in Oklahoma history, seem to have contributed to a leveling off of our MSFW population. However, despite these factors, Oklahoma continues to be one of the top agricultural states and recognizes the MSFW population who does work and live here.

Assessing the unique needs of the MSFW population in Oklahoma, like many other states, presents several challenges. The MSFW is difficult to identify, share information with or locate. Despite high agricultural activity within the state, it appears many MSFWs pass through Oklahoma for seasonal work and continue to other states, looking at Oklahoma as merely a “stopover”. While it is believed the MSFW population will remain stable for the coming years, the introduction of more organic and “natural” based agricultural products may lead to an increase in their population.

Typical comments from the field represent the MSFW as someone who is here to work, earn their money and move to the next location. They most generally are sending a significant portion of their pay to their families and must bring in a paycheck. They have no time for training for other employment, unless they can no longer work in the fields due to age, health or other factors. Employers, obviously, want to keep these valued workers and would be reluctant to encourage training or employment outside of meeting the agricultural needs they

have. Housing, if provided, is a place to eat, sleep and shower. Minimum requirements established by DOL-ETA and OSHA are met. If housing is not provided by the employer, a migrant worker is left to find his/her own housing.

Other factors such as healthcare, schooling for children, employer requirements, rights, insurance, health & safety information, availability of adequate work clothing and transportation, among others, are needs of the MSFWs. Lack of identification and contact makes it difficult to know how great the needs are. MSFWs are rarely provided transportation to be able to come to town or a career center. Career centers are not available when they are not working. The needed information must be brought to the MSFW in the fields, communities, or frequented businesses/services they utilize.

**A. An assessment of the agricultural activity in the State means: 1) identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.**

The following information regarding Oklahoma agriculture was obtained from the 2018 Oklahoma Agricultural Statistics, issued cooperatively by the National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry. (This is a summary of data through 2018.)

1) identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity:

Most major crops in Oklahoma are no longer considered labor-intensive with the exception of watermelon. Increased mechanization/technology, herbicides and genetically superior seeds/plants have continued to greatly reduce the need for vast numbers of laborers as in years past. However, the specialty crops/livestock related products and vegetables/produce for Farmers Markets are increasingly providing labor-intense work opportunities. Others have pursued some of these new ventures such as: Grass-fed dairy/beef, free range chicken and revitalization of sheep for meat, wool and wool products. The leading agricultural activities in Oklahoma are:

	Sales	Percent
Farms	(\$1,000)	of Total Sales
_____	_____	_____

Cattle and calves	52,048	\$3,729,662	1.39%
Grains, oilseeds, dry beans, and dry peas	7,621	\$789,056	0.96%
Poultry and eggs	10,573	\$934,854	1.13%
Hogs and pigs	2,264	\$1,030,645	0.2%
Other crops and hay	18,097	\$202,433	8.9%
Nursery, green house, floriculture, and sod	388	\$157,762	0.2%
Milk from cows	471	\$173,116	0.3%
Cotton and cottonseed	1,488	\$299,546	0.5%
Horses, ponies, mules, burros, and donkeys	4,085	\$51,067	8%
Fruits, tree nuts, and berries	405	\$50,600	0.8%
Vegetables, melons, potatoes, and sweet potatoes	511	\$16,981	3%

Sheep, goats, wool, mohair, and milk	2,216	\$13,406	17%
Other animals and other animal products	988	\$11,378	8%
Aquaculture	43	\$4,632	0.9%
Cut Christmas trees and short rotation woody crops	33	\$373	8%
Tobacco	-	-	-
	<hr/>	<hr/>	<hr/>
<b>Totals:</b>	80,245	\$7,129,584	100%

The table below details the heaviest crop activity related to planting and harvesting during the 12 month calendar year beginning with January and going through December. The frost free period is from mid-April until the 3<sup>rd</sup> week of October.

Crop	Planting	Harvest
	<hr/>	<hr/>
Winter Wheat:	Early Sep to Early Nov	June to Early July
Canola:	Early Sep to Early Oct	Mid May through June

Spring Oats:	Mid Feb to March	June to Mid-July
Corn:	Late March to Mid-May	Mid Aug to Late Oct
Soybeans:	Mid-April to Mid-July	Mid Sep through Nov
Sorghum:	Mid-April to Mid-July	Mid Sep through Nov
Peanuts:	Late April to Mid-June	Oct to Nov
Sunflowers:	May to July	Aug to Mid Dec
Cotton:	May to Late June	Oct through Dec
Alfalfa Hay:		Late April to Mid Oct

Oklahoma is most easily divided west and east with regard to agricultural activity. WESTERN OKLAHOMA is a predominant supplier of wheat, sorghum, canola, peanuts, cotton, corn and alfalfa. EASTERN OKLAHOMA is a predominant supplier of soybeans, hay, and corn.

**2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce):**

A review of various sources found no viable information for MSFW labor involvement and/or shortages in Oklahoma agriculture. The 2017 USDA, Census of Agriculture at the state level did provide some general information. • 16,794 Oklahoma farms hired 42,431 workers in 2017. Of those, 195 total farms reported total migrant workers of 592. A further breakout reveals 42 farms reporting only contract MSFW labor of 75 and 153 farms reporting 517 migrant workers with

hired labor. • Trends from the 2007, 2012 & 2017 census present the following: Total farms utilizing migrant workers have shown 919 farms in 2007, 189 farms in 2012, and 195 in 2017. A drop off of farms utilizing this type of worker was found to be 79% in 2012 and has remained steady over the least five years. Despite the migrant worker numbers, total farms with hired farm labor, in general, have continued to slightly decline over the last five years. \* 16,826 farms/48,644 workers in 2007 \* 18,108 farms/51,119 workers in 2012 \* 16,794/42,431 workers in 2017. This would seem to indicate more migrant workers being on the payroll versus local labor being brought in to work. However, Oklahoma 2017 Agricultural Statistics indicates Oklahoma remains at a national rank of 4<sup>th</sup> in the number of farms.

### **3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State:**

Oklahoma is a state of many climates and ecosystems. It is found in the Great Plains, is geographically centered within the 48 contiguous states and is the 20th largest state at 69,903 square miles. Ecosystems range from dry, arid plains to subtropical forests and mountains, having more ecological regions than any other state. Elevations range from 4,368 feet above sea level in the western panhandle to 289 feet above sea level in the southeast portion of the state. The mean elevation of the Oklahoma is considered to be 1,300 feet above sea level. Because of Oklahoma's location between regions of varying prevailing winds, its climate, winds, temperatures and weather, it makes for extreme variance in a locality's weather from day-to-day and extreme change between areas in close proximity. Because of this, an average of 62 tornados a year, drought, flood, extreme temperature variations and unpredictable weather in general, Oklahoma farmers deal with very unpredictable seasons, making for constantly changing plans for raising and changing crops and livestock in an attempt to turn a profit. Average annual precipitation ranges from 18" over 59 days in the western portion of the state to 51.9" over 96 days in the eastern portion of the state. Frost free periods in the western portions are typically about 143 days and 185 days in the eastern portion. The following information regarding Oklahoma agriculture was obtained from the 2013 and 2016 Oklahoma Agricultural Statistics, issued cooperatively by the National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry.

	2016	2018
	<hr/>	<hr/>
<b>Totals:</b>		
Harvested acres of principal crops:	8,196,000	7,812,594
Value of 16 top commodities:	\$6,849 billion	\$7,466 billion

Farms:	78,000	78,531
Land in farms:	34,200,000 acres	34,156,290 acres
Average farm size:	438 acres	435 acres

**OK National Agricultural Rankings for Crop Production:**

	2016	2018
Totals:		
Rye	1	6
Canola, Winter Wheat	2	2
All Wheat, Pecans, & All Other Hay	5	5
All Hay, Sorghum, Grain	11	22
Peanuts, Sunflower & Sorghum, Silage	Sorghum, Silage 3	Sorghum, Silage 3
	Peanuts, Sunflower 9	Peanuts, Sunflower9
All Cotton & Cottonseed	All Cotton 8	All Cotton 8



	Cottonseed 10	Cottonseed 10
Oats	26	26
Soybeans	24	24
Corn, Grain & Alfalfa Hay	27	27

**OK National Agricultural Rankings for Livestock:**

All Cows, Cattle & Calves	6	4
Hogs	7	7
Broiler Production	14	14
Red Meat Production	6	6
Sheep and Lambs	24	24
All Chickens	24	24
Eggs	22	22

Wool Production	31	31
Milk Production & Milk Cows	24	24

Preliminary data from USDA, National Agricultural Statistics Service and the Oklahoma Department of Agriculture, Food and Forestry indicate: Wheat production in 2018 was down 47% from the previous year. Production of row crops during 2018 were mixed compared to the 2017 crop year with corn for grain down 5%, sorghum yields down 18%, cotton planting up 68% and cotton yield up 75%, soybeans unchanged, canola production 54% less, and peanuts 52% lower. Hay was down 21% and pecans remained steady. Livestock related data for 2016-2018 reflected cattle inventory up 300 thousand head; sheep and lambs decreased 9,000 head and hog inventory saw a slight increase. Overall commercial red meat production was up 10% from 2016. Dairy related numbers found an increase of 5% for average number of milk cows and total milk production. Poultry data found chickens (except broilers) up 100 thousand birds; egg production was slightly down and broilers slightly up.

Predicting Oklahoma weather in the long term is almost impossible because of the dynamics of various regions influences upon it. Reviewing 2017-2018 statistics available, Oklahoma did continue its trend of unpredictable and extreme weather. The Oklahoma Climatology survey reported warmer than usual temperatures and bouts of increased precipitation and drought occurred during 2017-2018 across the state. This led to a busy wildfire season, particularly in the Northern part of the State. Two large wildfires burned a combined total of 348,000 acres and killed approximately 1,500 head of cattle. Any other loss of livestock or crops have not been reported.

**B. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.**

Oklahoma's foreign MSFWs primarily are from Mexico and other South American countries. Other foreign MSFWs include South African, Australian/New Zealand, Vietnamese and East

European workers. The primary language spoken by MSFWs is Spanish with some MSFWs speaking Vietnamese, Romanian and Afrikaans, with English frequently being a primary or secondary language for Australia/New Zealand and South Africa. Studies from 2003-2016 indicates an upward trend for the use of MSFWs in traditional crop production despite seasonal weather hazards. Weather will play a large role in seasonal prep, planting, maintaining, harvesting and finishing of all crops, frequently changing numbers of workers needed onsite from day to day. Weather also will bring long periods waiting on the weather to break, resulting in short bursts of high activity, mostly being completed by local and available workers.

A review of Oklahoma's Foreign Labor certification program for CY 2018 finds that H-2A posted 34.5% (247) of their openings during a 3 month period from April to June (our peak season), representing almost half of all positions posted. The remaining 65.5% (468) positions were spread throughout the rest of the year during our off peak season. The most recent National Center for Farmworker Health (NCFH) MSFW Enumeration Profiles Study for Oklahoma indicated 8,201 MSFWs (including US workers) in the state. This would indicate that visa workers are not Oklahoma's primary resource for MSFW employment. The H-2A workers are primarily migrant and seasonal, as would be expected. The NCFH Enumeration study identified 3,391 migrant and 4,721 seasonal workers. It is known that some workers pick up more than 1 temporary agricultural worker position in a year, which could amount to a type of "year-round" farm working, but not with just one employer.

Data from O\*Net Online. Reviewing their 10 year - 2014-2024 predictions agricultural positions in Oklahoma will show some growth and some loss: • 45-2091.00 Agricultural Equipment Operators +2% • 45-2092.00 Farmworkers and Laborers, Crop, Nursery, and Greenhouse -8% • 45-2093.00 Farmworkers, Farm, Ranch and Aquacultural Animals +5% • 45-2041.00 Graders and Sorters, Agricultural Products -7% %

These numbers could be reflective of employers hiring more permanent workers to maintain their business year-round and dealing with severe/extreme weather factors. A review of DOL ETA 9002 series reports has provided the following data for MSFWs in Oklahoma:

12/31/2012 Total = 65 Participants Entered Employment= 43.9% Employed at 6 months= 75%  
12/31/2013 Total = 49 Participants Entered Employment= 67.39% Employed at 6 months= 70.97%  
12/31/2014 Total = 48 Participants Entered Employment = 77.27% Employed at 6 months = 68.97%  
12/31/2015 Total = 56 Participants Entered Employment= 75% Employed at 6 months = 82.22%  
12/31/2016 Total = 26 Participants Entered Employment = 56.67% Employed at 6 months = 45%

Statistic for 2017 and 2018 are not available at this time:

These numbers could be reflective of more self-identification as MSFW and/or increased numbers of MSFW not being employed & registering for unemployment or seeking work. It would be anticipated MSFW workers will remain approximately the same. However, since the original publication of this AOP, a change in the definition of MSFWs has resulted in correctly identified MSFWs, under this new definition, being listed in the single digit range. No longer are MSFWs carrying that identifier once they have not worked MSFW seasonal agricultural

activities in the past 12 months. This extreme drop-off of recognized MSFWs will probably not reach 20 registrants in OKJobMatch over the next year.

Finally, casual discussion with WIA Section 167 National Farmworker Jobs Program (NJJP) grantee and employers in agriculture during the 2018 Annual Prevailing Wage Survey has presented two continuing factors for consideration:

1. Energy and infrastructure related employment in Oklahoma entices away many of the ranchers', farmers and harvesters best workers away. Unable to keep up with these related wages, agricultural workers are reportedly less skilled and less dependable. Several employers report dealing with many who want to work on a day-to-day basis, with no commitment to the job.

2. Another unfortunate reality is that although Oklahoma has made it difficult to hire illegal immigrants through tougher laws and regulations than most states, Oklahoma now has the fastest increase in the nation for people without legal status. According to the Pew Research Center, 75,000 undocumented immigrants (mostly Mexican) call Oklahoma home. Of those, it is very likely a large number are working in agricultural settings, where enforcement of laws and regulations is nearly impossible and they go uncounted. Any activity such as this does and will continue to affect the agricultural worker numbers.

3. 1.16% of all Oklahoma farms and ranches hire migrant workers. A total of 592 migrant workers were reported by the 2017 USDA, Census of Agriculture. It is anticipated the number of migrant workers will range between 800-1,000 workers for the next year. Using data from O\*Net online, an average increase of 1-3% per year of all MSFW could be projected. (2019 update: Another item which is creating unreliable data and projections is the current and unpredictable political climate and policies surrounding immigrants of all type. It would have been anticipated that an increase in MSFWs to handle production and collection of "hand" crops would have increased, but unworked fields are reportedly on the increase. Undocumented MSFWs are hiding and moving frequently. Identification of any immigrant worker is seen as a threat and employers continue to protect their good/long-term MSFWs. Trying to locate & identify MSFWs in Oklahoma has gone from difficult to practically impossible. This will likely result in a further decrease of locating and identifying MSFWs.)

## **2. Outreach Activities**

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

Oklahoma strives to continue improvement interacting with and providing assistance to our MSFW community. Oklahoma is not designated as a significant MSFW state due to the low percentage of MSFWs identified. Most contact with MSFWs is through our Oklahoma Workforce Centers when MSFWs register for unemployment or other center services. Based on the USDOL definition for MSFWs there are no registered MSFWs in OKJobMatch. Additional partnerships will continue to provide more sources for dissemination of information about the

Oklahoma Employment Security Commission's (OESC) and other partners' services, training opportunities, and MSFW rights, health and safety information. Available resources for potential outreach activities include, but are not limited to ORO, OSHA, DOL Wage & Hour, the Oklahoma Department of Human Services, the Oklahoma Department of Education, Oklahoma Department of Agriculture, Workforce Development Boards, Oklahoma Works, and various health, medical and charitable organizations which serve the MSFWs. More specifically, Oklahoma will continue to train and assign state merit center staff who meet the required qualifications for an outreach worker and who are currently working in areas of high MSFW activity. The outreach workers will concentrate on locating and contacting MSFWs in their assigned area of the state, as part-time outreach workers. This outreach activity are revisited a minimum of once a year to review data collected and determine if the number of outreach workers or their locations need to be adjusted. The outreach workers will continue to identify MSFW populations, including their locations and provide outreach activities. The State Monitor Advocate (SMA) will continue ensure fluid communication of data, information and provision of manpower in a unified manner throughout the state. This has allowed various reporting requirements to be met in a more efficient manner. In 2018 registered MSFWs were less than 10. Oklahoma trained and assigned 3 state merit center, bilingual staff to become outreach workers. The outreach workers targeted areas where populations of MSFWs & their families were reported. Each OW has ensured all potential MSFWs receive the full range of employment and training services offered to the general public.

**A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.**

The OESC and its outreach workers will continue the effort of increasing the publicizing of its employment, training and supportive services available at centers by promoting these centers as a viable resource for MSFWs through increased outreach activities. OESC outreach workers will maintain on tract striving to contact those MSFWs not coming into local office where they work or live and will continue to target community based businesses and events in MSFW communities (i.e., shopping center, stores, restaurants, libraries etc....) to reach MSFWs with informational materials about center services and opportunities.

The strategic placement of qualified outreach workers throughout the state is crucial for contacting farmworkers who cannot be reached through normal intake activities at the local centers.

On-going outreach activities includes the following:

- Limited English Proficiency (LEP) group - The policy of OESC is to provide quality and timely language assistance services to customers with LEP to ensure meaningful access to programs, services and activities. The LEP program is identifying significant documents, informational materials and other items used on a daily basis in our workforce centers to translate to Spanish or any other native language. Our OKJobMatch database systems allows for a variety of language options. Increased promotion of availability of bilingual staff and translation services occur, both within the offices and in the field, through written brochures, posters and staff.
- Placement of bilingual Oklahoma Workforce Centers – OESC has 10 Spanish speaking staff in local offices and various state office positions. Bilingual staff are being placed in

high volume offices or units (i.e., call center for unemployment) to assist Spanish speaking customers. • Identification of pertinent groups, organizations and associations involved with the agricultural community. OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFWs; including, but not limited to: the Oklahoma Works, Oklahoma Department of Education, the U.S. Department of Labor, the Oklahoma Department of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. The OESC will continue to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs. Further connections have been made with OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC's SMA continues to identify and reach-out to network with a variety of agricultural-related agencies, both governmental and private. This effort has resulted in the establishment of the Oklahoma Agricultural Outreach Group.

- Establish networking and some structured communication with these groups, organizations and associations to help to identify ongoing needs and services. The Agricultural Outreach Group facilitates an exchange of information regarding services, communication of events, and identifying the needs for each member with regard to working with Oklahoma agricultural employers and workers. The Agricultural Outreach Group meetings that emphasize the attaining of locations of MSFWs are attended within the limits of available resources. The OESC is the unifying force for this activity and networking at the present time. The lead for this groups will be shared and updated on a yearly basis. The OSEC will continue to Identify and provide increased literature and media outreach to the agricultural community. The Oklahoma Agricultural Outreach Group was established and meets quarterly to exchange information, request assistance from each other and discuss common needs and issues. The membership now exceeds 30 members. A sub-group has started identifying areas of the state to have community training/forums for employers. Community based events are discussed and attended for the benefit of the MSFW and their families. The development of MSFW informational packet for workers and for employers summarizing available resources will continue to be updated each year. Information is being compiled for both a MSFW and Agricultural Employment Handbook. The completion date is set for the fall of 2020 is planned for the MSFW handbook as an additional media outreach activity. Packets of informational materials are available to MSFWs and their employers from outreach workers, training, and offices. A new goal for the MSFW Handbook is fall 2020, with an Agricultural Employment Handbook for employers by December 2020. • Establish a more visible MSFW State Monitor Advocate. The Oklahoma State Monitor Advocate webpage that was placed on the OESC agency website continues to be. In addition to the basic role, items such as agricultural related materials for the worker and employer, links and location of centers and agency/community resources, complaint process, safety and other informational items are now displayed. All SMA, Foreign Labor, MSFW webpages are reviewed and updated throughout the year as need for informational changes.
- Provisions for extensive training to OESC and partner staffs in Oklahoma Workforce Centers to better identify MSFWs, their needs and service requirements, and provide informational material to those MSFWs, employers and organizations in their counties served. A desk aid for staff to assist in the proper identification of MSFWs has been

created and distributed. This has assisted center staff & partners in the identification of and assistance to MSFWs. Continued training on MSFW identification and any system issues as related to Oklahoma Workforce Center staff is ongoing.

- Market Oklahoma Workforce Centers will continue to use both flyers and web-based information as viable tools to assist center staff in identifying the MSFW population. Both flyers and web-based information will be used for this purpose. The OESC webpage will continue to display all offices, with information on each. Links to this site will be available in more locations. Handouts will continue to be developed for outreach activities, job fairs or other events. The Handouts will be also be distributed through outreach events and field visits. Oklahoma Workforce Centers now have posters, brochures and reception area marquee information for provision of translation services, along with media identifying available services at centers and resources in the community (English/Spanish). Partnering with the ORO Development Corporation, a current grantee provider of the WIOA Title I Section 167 program and non-profit corporation of the State of Oklahoma will continue to be developed and utilized by our Oklahoma Works Centers. ORO provides employment, training, supportive services and High School Equivalency Program (HEP) to Oklahoma's MSFWs, often through referral from our Workforce Centers. ORO is located in 3 Oklahoma Workforce Centers and works alongside OESC staff and other partners to provide increased services in the parts of the state with higher concentration of MSFW population. Now located in 4 areas of the state with added outreach workers for each area. SMA continues to be involved in various aspects of ORO activities and planning. Plans to coordinate outreach activities between ORO and OESC have started and are ongoing. ORO continues to be a strong partner with OESC in addressing MSFW needs.

**B. Providing technical assistance to outreach workers. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the employment service complaint system, information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.**

Training for OESC and outreach staff will continue include training modules that are being developed to address multiple aspects such as: agricultural employer or jobseeker contacts, job order requirements, referrals to posted jobs and all center services, identification of MSFWs, rights, complaints, unemployment insurance and sexual harassment/human trafficking. These modules will address past and current regulatory requirements found in 20 CFR Part 653. This training will be extended to partners, OESC related divisions (including UI) and other agriculturally related agencies and providers as needed. OESC will coordinate with the WIOA Section 167 NFJP recipient with regard to MSFW needs, and to facilitate or provide intensive services and training services. This will be facilitated by a Memorandum of Understanding (MOU). The OESC will continue to engage with other agricultural groups, associations and organizations for the purpose of identifying and assisting MSFWs. OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and

Oklahoma Departments of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. Additional connections are being sought with OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC will work to establish networking and some structured communication with these groups, organizations and associations to help to identify ongoing needs and services.

Training has occurred for Oklahoma Works Centers for most items listed. Outreach Workers attended a USDOL E&T presentation on sexual harassment & human trafficking and plans are for a member of the Oklahoma State Bureau of Investigation (OSBI) to present these and similar topics to all staff by the Summer 2018, as required by regulation. Evaluation as to the effectiveness of this training is presently occurring with retraining of problem areas as quickly as possible.

The MOU with ORO and the SMA, has been updated. A previous MOU remains in place and addresses much of the items needed. OESC continues to seek other agencies or groups which can assist in sharing information or facilitating training or assistance. This is ongoing.

Contact with other relevant agencies is planned, including the Red Cross and Catholic Charities for assistance with stranded travelers. Visits with Oklahoma Department of Agriculture, Legal Aid of Oklahoma, the Mexican Consulate and various health related organizations are also planned. There are OESC Area Managers present and actively participating WIOA Board meetings. An agricultural based work group has been established. Meetings to realize a joint effort with others to locate and assist MSFWs will be attended within the limits of available resources. Communicate with others the need for agencies/providers sharing a common forum. OESC plans to be a unifying force for this activity and to continue the networking in the future.

Contact has been established with Legal Aid of Oklahoma, Oklahoma Department of Agriculture and the Mexican Consulate and they are members of our Agricultural Outreach Group. Other new members include University of Oklahoma ESL Department, Variety Care, OSHA, Oklahoma State Department of Education Migrant student section, the Office of Education of Federal Programs Migrant Education Program and Title III Stakeholder and the National Safety Council. Outreach workers attend all Oklahoma Agricultural Group meetings. We continue to pursue, contact and involve other relevant groups.

### **C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.**

As part of the initial outreach worker training and ongoing training modules, outreach workers will become familiar with core elements of partner programs, including the Unemployment Insurance (UI) program and UI eligibility. This training will address items such as eligibility, program services and benefits, resources for additional or more detailed information, application and contact information. Plans are for both this topic of training as well as other outreach related topics, to occur a minimum of once a year, with training on any adjustments, new topics or



responsibilities occurring as needed. Training has occurred for outreach workers. Training specific to UI program & UI eligibility did occur in June 2018. This is ongoing.

**D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.**

For the continuing training and development of outreach workers, state or national professional development opportunities will be attended by State merit staff outreach workers within the limits of available resources. These continuing training and development opportunities for State merit staff outreach workers will take advantage of statewide WIOA related trainings, employee continuing education and other related training/informational events which will benefit their knowledge and skills. Pertinent national training and development opportunities will be considered as information becomes available. State merit staff outreach workers are being informed of relevant training available at a state, regional or national level. An example of which is attending a national USDOL webinar presented by the National Monitor Advocate. The SMA continues to provide a variety of required and topical training for the outreach workers. The outreach workers are also permanent members of the Agricultural Outreach Group and become aware of many events through these meetings. Budgetary resources are limited for travel & training.

**E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.**

OESC will continue to coordinate with the WIOA Section 167 NFJP grantee, Oro Development Corporation (ORO), to identify MSFW needs, and to facilitate needed outreach. This effort will be aided by a Memorandum of Understanding (MOU). The OESC will engage with other agricultural groups, associations and organizations for the purpose of identifying and assisting MSFWs. Much of this engagement will continue to occur through our agricultural outreach group. A past MOU remains in place until this is developed.

OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and Oklahoma Departments of Labor, ORO Development Corporation (Section 167 Farmworker Program grant recipient), and the local WIOA Workforce Development Boards. SMA will contact WDBs in 2018-2020.

OESC continues to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs. These alliances include but are not limited to OSHA, US Department of Justice, EPA, CDC, and Health & Human Services, as they relate to MSFWs and other agricultural workers. OESC will work to establish networking and some structured communication with these agricultural groups, organizations and associations to help to identify ongoing needs and services.

Contact with other relevant agencies is planned, including the Red Cross and Catholic Charities for assistance with stranded travelers. Visits with Oklahoma Department of Agriculture, Legal

Aid of Oklahoma, the Mexican Consulate and various health related organizations are also planned. The SMA and outreach workers will become more active participants in WIOA Board, Area Manager and statewide Oklahoma Works Center meetings. Meetings to realize a joint effort with others to locate and assist MSFWs will be attended within the limits of available resources. Communicating with others the need for agencies/providers sharing a common forum is a priority for Oklahoma. The OESC plans to be a unifying force for this activity and networking opportunity in the coming year. Ongoing development of relationships with a variety of agencies and organizations will continue. Good progress has been made, as previously noted.

OESC hosted an Oklahoma agricultural outreach group meeting in February 2016 and will continue to host like meetings. Attending this first meeting were representatives from various U.S. DOL and Oklahoma Departments of Labor divisions, the regional Mexican Consulate, USDA, Oklahoma Department of Agriculture, Food & Forestry, ORO Development Corporation, Oklahoma Employment Security Commission, and an H-2A/H-2B agent. Additional section members of the USDA, OSU agricultural researchers & educators, Legal Aid, Farm Bureau, Oklahoma Farmers Union, 4H, FFA, the Oklahoma Health Department, Workforce Development Boards, and the medical community have been contacted. These meetings are intended to be a joint effort of all agricultural entities within the state to better coordinate, communicate and reach all agriculturally impacted patrons, whatever their position or need. As mentioned previously, this group continues to grow in number of members, focus and benefit to not only its membership, but also to the benefit of agricultural employers and workers, including MSFWs.

### **3. Services provided to farmworkers and agricultural employers through the one-stop delivery system.**

Describe the State agency's proposed strategies for:

**A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:**

- i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;**
- ii. How the State serves agricultural employers and how it intends to improve such services.**

Oklahoma's strategy for addressing career and training services required under the WIOA Title I provided to MSFWs through the one stop centers includes a variety of programs, services and assistance available at our centers or through partners. Such strategies include:

- Informational flyers and access to computers for online application provided in outreach activities at workforce centers, at cultural/community events and through media outlets (radio) represent the best methods at this time.
- Oklahoma prides itself on taking care of its citizens by whatever means are necessary within available resources. The MSFW, who seeks services through our workforce centers, is provided the same level of services as any other customer who walks through

our doors. Center services include access to job postings, referrals and job developments to all types of jobs; training services through WIOA partners; assistance in registering in OKJobMatch; assessments; information on employee rights with MSFW specific rights included; a system for registering complaints; information and referrals to other agencies and providers outside of the centers; labor market information, use of computers, phones and faxes, a variety of workshops, resume assistance and language services.

- The Limited English Proficiency (LEP) program is identifying significant documents, informational materials and other items used on a daily basis in our workforce centers to translate to Spanish. Additionally, translation services, in many languages, are available as needed.
- Oklahoma's OKJobMatch database system allows for a variety of language options. Additionally, there are computers available for online applications, external job search and research.
- Bilingual staffs are located in offices serving those of Hispanic descent. Currently the state has eleven (11) bilingual Spanish-speaking staff employed by OESC and four (4) bilingual Spanish speaking staff employed by ORO in centers where more Spanish-speaking clientele are more likely to visit. No other language group is identified to require the placement of bilingual staff in any other language as translation services are suitable.
- Partnership with the ORO Development Corporation (ORO), a current grantee provider of the WIOA Title I Section 167 program and non-profit corporation of the State of Oklahoma, will continue to be developed and utilized by our workforce centers. ORO provides employment, training and supportive services to Oklahoma's MSFWs, often through referral from our workforce centers. ORO is located in 4 areas of the state and work alongside OESC staff, additional outreach workers, and other partners to provide increased services in the parts of the state with higher concentration of MSFW population. Co-enrollment of ORO clients into OKJobMatch is being assessed.
- OESC continues to maintain relationships with agencies who may assist or who work specifically with the MSFW; included but not limited to the Oklahoma Works, Oklahoma Department of Education, and US and Oklahoma Departments of Labor. OESC will continue to work in establishing new alliances with those entities which will be of assistance to us and the provision of services to MSFWs.
- Meetings to realize a joint effort with others to locate and assist MSFWs will be attended. OESC plans to be a unifying force for this activity and networking in the future.
- Cooperation between OESC's Director of Reemployment Services Customer Service Division, WIOA Director and State Monitor Advocate will ensure MSFW needs and services are addressed throughout the State's Workforce and WDA systems.
- Increased interaction with Workforce Development Boards is anticipated to communicate needs and ensure their commitment to working with the MSFW. Contact with Workforce Development Boards will occur in 2018 by SMA.
- Training for all center staff will include modules on definition and identification of the MSFW, addressment of rights, complaints and potential language services needed, and the Agricultural Recruitment System (ARS) as a means for proper placement of MSFWs in all agricultural jobs, especially those outside of the Foreign Labor Certification (FLC) program's H-2A and H-2B job orders. Staff will be trained on additional resources for the MSFW and/or employers when handbook(s) are completed. A viewing of a state

developed PowerPoint will be required of all new center staff addressing these items and will be available for all OESC staff new hire orientation. Initial training has occurred. Assessment of knowledge gained from this training is in process, with additional training as needed.

- Development of a center practice which requires staff to pursue contact with those MSFWs, who are registered (typically through self-registration) but not engaged in programs or services, to insure they are knowledgeable of what is available to them. Policy and training will be in place by May 2018. This is ongoing training.
- Outreach workers will take center information and services to the MSFW population unable to come to the centers. Marketing center services as a viable option for MSFWs to encourage them visiting the center in the area they work or live. This has been occurring primarily through events and distribution of informational materials. Outreach worker field visits to MSFW places of employment or communities will continue to be encouraged and planned as locations are identified.
- Agricultural employer services are not only addressed through common employer service at the centers, such as assistance with Federal, State and Local regulatory compliance; skills and proficiency testing; screening of applicants if required or requested; LMI; registration on OKJobMatch which includes job posting and resume search capabilities; information on several incentive programs for hiring targeted populations; and Career Readiness Certification. Agricultural employers specifically receive specialized assistance in filling their job openings through compliant job orders in OKJobMatch. Applicants are informed by Center staff regarding the conditions, duties, pay, etc... of these unique posting and applicants are screened for meeting job requirements before referral to the employer. For farm workers or employers, presentations and technical assistance by outreach workers and/or compliance agencies is available. The use of the Agricultural Recruitment System (ARS), providing pre-occupancy housing inspections and assisting agents/employers with job posting requirements represents some other services provided. Ongoing. The ARS is currently being updated, with policy & procedures to be completed by April 2018. Training to all staff will occur shortly after. Field checks and apparent violation training will also be part of this ARS training. Training has occurred and will continue to be ongoing.

## **B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.**

The Oklahoma employment service complaint system has been revised and training provided to center and other OESC staff. The process is being monitored by the SMA, through desk reviews and on-site local office visits, and when deficiencies are identified, training is provided. with clarification (through desk reviews, emails, conference call or webinar) provided when issues are identified. It is also anticipated that giving further training to one-stop center staff in properly identifying MSFWs will result in more MSFW complaints being identified. Outreach workers and their activity in work and community settings, will allow for increased knowledge of not only the complaint system but all available resources. Additionally, training of the complaint system for all one-stop center staff should also lead to increased use of the complaint system. Developed outreach material will include complaint system information for workers, employers and organizations who work with MSFWs. This is ongoing. Complaint policy & procedures

were updated and all center staff trained. The complaint system is currently being marketed through informational brochures (English/Spanish), posters and outreach.

### **C. Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.**

Oklahoma currently markets the Agricultural Recruitment System (ARS) through the Oklahoma Employment Security website, which also includes references to USDOL websites. We will also improve the marketing of the ARS by developing and distributing agricultural handbooks for employers and farmworkers which will incorporate the ARS as handled in Oklahoma. The handbook will also be available electronically on the OESC website. Once available, these handbooks will be marketed through Centers, employer associations and agents. Center staff will be required to have training on not only the ARS, but other related MSFW and agricultural employer topics. Additionally, ARS information will be marketed through attachments to our annual Wage and Hour surveys; email or mailing blasts to those employers with agricultural NAICS codes; focused promotional telephone contacts and advertisements in Oklahoma agricultural magazines, newsletters or other media outlets and targeted presentations. Training to address the specific requirements for all agricultural job orders handled by center staff is being planned so that staff will be able to better communicate the advantages and requirements of the ARS. ARS has been updated with policy & procedures. There will be ongoing training to all staff.

## **4. Other Requirements**

### **A. Collaboration**

*Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).*

There are Non-Financial Cooperative Agreements in place between OESC, the Area Workforce Development Boards, the State Monitor Advocate and ORO, our NFJP partner. A new MOU with ORO was finalized by July 2018. Oklahoma established an agricultural outreach committee with the first meeting held in February 2016. The intent of the committee is to increase collaboration between federal, state and other government agencies as well as other service and community providers. Collaboration has been in place and continues to grow as we become more familiar with other MSFW providers. This multi-agency outreach group is currently defining its vision and purpose for the future, and how to better communicate its purpose. This is ongoing.

### **B. Review and Public Comment.**

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The Oklahoma AOP was originally sent out for review and comment as required. The director of Oklahomans for Rural Opportunities Development Corporation (ORO, our NFJP grantee), the director of the OESC RES - Customer Support Division and the Policy and Program Officer of the Oklahoma Office of Workforce Development have reported back as to the plan being “a good plan of action” and “moving in the right direction”. This AOP was available for review and comment as part of the Oklahoma 4-year state plan with no comments received relating to the AOP portions This Jan 2018 update of the AOP was made available for review to ORO, our NFJP grantee and the OESC Re-employment Services (RES) – Customer Services Director immediately upon completion. A copy was also provided to all 39 Oklahoma Agricultural Group members. The AOP will also be posted by Oklahoma Works (WIOA) as part of the comment period for the entire state plan. We would like the following agencies to received a copy for review:

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Name	Response	Name	Response
ORO (NFJP) (2)		OESC RES Customer Service	
OK Dept of Agriculture – Market Development, Consumer Protection (2)		University of Oklahoma Center for English as a Second Language (3)	

Variety Care – Farm Worker Health		OKDOL- Child Labor Program	
Mexican Consulate (3)		USDOL – OSHA (2)	
OKDOL OSHA Industrial Hygiene		OESC – Outreach workers (3)	
Legal Aid of Oklahoma (3)		OK State Dept of Education – Migrant Education Program	
OESC FLC Specialist		National Safety Council	
Oklahoma Cooperative Extension – OSU (3)		US DOL Wage & Hour (2)	
National Safety Council		OK Employer Traffic Safety	
Okie 811 – Damage Prevention		USDA – Risk Management	
Oklahoma Safety Council		OESC Center Managers (3)	

### **C. Data Assessment.**

*Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as*

*compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.*

A review of the past four (4) years of data from the USDOL Labor Exchange Agricultural Reporting System (LEARS) addressing that MSFWs are provided quantitatively proportionate services as non-MSFWs are shows that Oklahoma met the required levels. The monitoring and review of every applicant that registered as a MSFW allows proper and correct identification of miss- registered/classified applicants. This procedure allow centers to reach out to those MSFWs to ensure availability of programs and services are communicated. The state believes the proper identification of MSFWs at Centers and in OKJobMatch will result in meeting more equity indicators each quarter. A change in MSFW definition, combined with a change in data collection and reporting methods makes it difficult to efficiently and consistently identify all MSFWs. Training, review of MSFW registrations (both in Center and self-service) for proper designation and follow-up with self-service MSFWs to provide center informational services is ongoing. The SMA will continue review and advocate for improved data representative of the agricultural community, its employers and workers. MSFW data which needs to be collected will be a primary focus.

#### **D. Assessment of progress**

*The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.*

Progress from the last plan has been made. This includes but is not limited to:

- 1) the establishment of an agricultural outreach group as a joint effort between OESC and DOL Wage & Hour; This group continues to grow and is becoming more unified in strategies to educate others about concerns of MSFWs.
- 2) identification of significant documents, informational materials and other items used daily by our centers which need translation to Spanish, the primary non-English language identified; Occurred and continues to occur as needed.
- 3) identification of pertinent agricultural groups, organizations and associations and pursuing alliances with them; Occurs through the Oklahoma Agricultural Outreach Group and planning for outreach activities.
- 4) establishment of a more visible MSFW internet presence through the development and continued updates of an Oklahoma State Monitor webpage on the OESC website; This webpage & several related ones will be updated by approximately December 2019.
- 5) Ongoing training to center staff with a desk aid for proper identification of MSFWs; Desk aid with new MSFW definition trained upon and provided. This training will be ongoing.



6) improved partnership and developing a new MOU with our NFJP partner; Interaction between ORO and SMA continues and discussion of coordinated outreach is one focus. Updates to MOU will be in place by December 2019. and

7) Identification of community based events related to MSFWs or their communities is ongoing.

Several activities needing further attention which are carried over to this plan, include but are not limited to:

1) Outreach staffing and required activities; Re-assignment of three merit staff outreach workers in state outreach positions. Ongoing training for items such as Human Trafficking, sexual harassment, UI benefits, reporting apparent violations, etc. (Note: two Outreach Worker were promoted to other position and will be replaced). Continuing to make outreach workers aware of all available training and encourage their participation. Training for all is ongoing.

2) the marketing of state centers as a viable resource for farmworkers; This has been occurring through outreach activities and providing information materials to MSFWs or family. Marketing of this, in conjunction with complaint information will be reviewed for possible commercial media applications (i.e. ads, radio or other methods of communication). This is ongoing.

3) monitoring of local centers to identify areas or practices requiring training and establishing training modules to train center staff and partners in identification of MSFWs, service and programs needed; proper registration and follow-up of registered farmworkers, and the ARS system as a venue for all agricultural job orders placed and those requirements.

4) the development and distribution of handbooks to assist both farmworkers and employers; Informational materials continue to be developed and provided. A new goal for the MSFW Handbook is fall 2020, with an Agricultural Employment Handbook for employers by March 2021.

5) development of OESC MSFW policy and procedures; MSFW System Policy and Procedures goal for completion by fall of 2021. and

6) identifying proven LMI methods and other data gathering resources for better identification of MSFWs in the state. SMA will continue to identify and provide data shortcomings on available MSFW information in Oklahoma, to relevant divisions or agencies.

## **E. State Monitor Advocate**

*The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.*

Update of the Oklahoma State AOP was completed, reviewed & approved by Oklahoma State Monitor Advocate.

## **Wagner-Peyser Assurances**

The State Plan must include assurances that:

1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3)); Yes
2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes
4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

## **Adult Education and Family Literacy Act Programs**

The Unified or Combined State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under title II, the Adult Education and Family Literacy Act (AEFLA).

### **a. Aligning of Content Standards**

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The ODCTE Adult Basic Education Division will utilize the Oklahoma state approved standards adopted by the Oklahoma State Department of Education. State adopted standards:

- Do focus on deep thinking, conceptual understanding, and real-world problem solving skills
- Do set expectations for students to be College, Career, and Citizenship ready
- Do incorporate literacy in Science, Social Studies, and Technical Subjects
- Do emphasize the use of citations and examples from texts when creating opinions and arguments
- Do increase rigor and grade-level expectations

- Do determine the full range of support for English Language Learners and Students with Special needs.

Oklahoma's approved assessments are standardized, valid, reliable, and approved for use by the Office of Career and Technical Education (OCTAE). Standardized is defined as having directions, time limits, materials, and scoring procedures that are designed to remain constant each time the test is given. Valid is defined as the degree to which the assessment actually measures what it is intended to measure. Reliable is defined as the consistency with which an assessment produces results. Pre-assessment is defined as the initial assessment administered to a student when they first enroll in the program for the current fiscal year. Post-assessment is defined as an assessment administered to a student to measure learning gains since the pre-assessment or their last assessment in the current fiscal year.

Educational functioning level of a student is determined by the National Reporting System (NRS) approved standardized assessment scale scores (<http://www.nrsweb.org/>). All students are placed into an appropriate Educational Functioning Level (EFL) as determined by the student's scale score of the standardized assessments chosen by the state. State performance targets for the NRS educational functioning levels are negotiated between the state and OCTAE each fiscal year. Local programs are responsible for meeting these state EFL targets. The state's aggregated pre- and post-assessment data collected from local programs determines whether or not the state meets its performance targets for a fiscal year. In addition to using required standardized assessments for NRS reporting and accountability, programs use assessments for instructional purposes.

Accountability and reporting purposes of assessment include but are not limited to:

1. Uniform measurement of learner gains that are aligned with the NRS educational functioning levels.
2. Consistent comparison of the success of programs in meeting state performance targets.
3. Consistent comparison of program data for performance-based funding.

Instructional purposes of assessment include but are not limited to:

1. Determining the instructional needs of individual learners.
2. Determining the effectiveness of instruction through learner gains.
3. Providing information regarding local program and/or statewide professional development needs.

## **b. Local Activities**

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

## Adult Education and Literacy Activities (Section 203 of WIOA):

- Adult education
- Literacy
- Workplace adult education and literacy activities
- Family literacy activities
- English language acquisition activities
- Integrated English literacy and civics education
- Workforce preparation activities; or
- Integrated education and training that –
  - Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  - Is for the purpose of educational and career advancement.

All Adult Education and Literacy activities under WIOA are authorized by the Oklahoma Department of Career and Technology Education. ODCTE administers and monitors federal and state adult education and literacy funds to local providers and provides program development and training activities in order to assure quality basic skills services for all students across the State. Under WIOA, ODCTE will fund Adult education; Literacy; Workplace adult education and literacy activities; Family literacy activities; English language acquisition activities; Integrated English literacy and civics education; Workplace preparation activities or; Integrated education and training that provide adult education concurrently and contextually for the purpose of educational and career advancement. Every ABE service provider will provide one or more of these local activities. ABE service providers not providing all local activities listed may assist ABE students in referring those students to organizations that provide those activities. For example, if an ABE service provider who is providing adult education and literacy but is not providing integrated education and training, then said provider will need to assist interested students to those organizations providing workforce preparation activities.

### Definition of Activities:

1. Adult Education: academic instruction and educational services below the postsecondary level that include an individual's ability to • Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its equivalent;
  - o Transition to postsecondary education and training; and
  - o Obtain employment
2. Literacy: the ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family, and in society.
3. Workplace Adult Education and literacy activities: Adult Education and literacy activities in collaboration with an employer or employee organization at a workplace or off site location that is designed to improve the productivity of the workforce.

4. Family literacy activities: activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all of the following activities:

- o Parent or family Adult Education and literacy activities that lead to readiness for postsecondary education or training, career advancement, and economic self-sufficiency;
- o Interactive literacy activities between parents or family members and their children;
- o Training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; and • Age-appropriate education to prepare children for success in school and life experiences.
- o No funds under this grant may be used for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for Adult Education and literacy activities under this title for activities other than activities for eligible individuals.

5. English language acquisition activities: a program of instruction designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language and that leads to

- o Attainment of a secondary school diploma or its equivalent and
- o Transition to postsecondary education and training; or
- o Employment.

6. Integrated English literacy and civics activities: education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries that enable them to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training.

7. Workforce preparation activities: activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

8. Integrated education and training: a service approach that provides Adult Education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. This includes offering courses in collaboration with

community colleges or technology centers that are team taught by an Adult Education basic skills teacher and a career/technical teacher.

Adult education and literacy activities, including adult education, literacy, and family literacy activities, will utilize the Oklahoma Academic Standards established by the Oklahoma State Department of Education. Standards have been developed by the Oklahoma SDE that include English Language Arts, Mathematics, Science, Social Studies, and Personal Financial Literacy. The Oklahoma Academic Standards serve as expectations for what students should know and be able to do by the time they complete their high school equivalency. These standards may assist the Oklahoma ABE providers in providing the guidance and expectations necessary for a student to receive their secondary school diploma.

The ODCTE strives to serve more adult basic education students and serve those more efficiently in order to transition them as quickly as possible to postsecondary education and/or family-sustaining jobs. The ODCTE assists those adults who are most in need of literacy services, including low income individuals, adults with minimal literacy skills, and adults with disabilities, in improving their ability to read, write, and speak in English, compute and solve problems at levels of proficiency necessary to function on the job, in the family, and in society. The ODCTE will conduct an open competition for new grants to be awarded July 1, 2018. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers. The grant application will contain the local application criteria listed in Section 232 of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy. Applications will be reviewed by the ODCTE to evaluate demonstrated effectiveness. Eligible provider applications that demonstrate effectiveness will then be reviewed by a review panel selected by ODCTE staff members. A rubric will be developed and evaluation criteria will include the 13 considerations in 231(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy, as well as other components deemed necessary to review the application.

The 13 considerations are as follows:

1. Describe the degree to which your organization would be responsive to—

- o regional needs as identified in the local workforce development area plan under section 108 of title I of WIOA;
- o serving individuals in the community who were identified in the local workforce development area plan as most in need of adult education and literacy activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of your organization to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of your organization in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in question 4 above, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which your organization demonstrates alignment between proposed activities and services and the strategy and goals of the local workforce development area plan (section 108), as well as the activities and services of the one-stop partners;
5. Whether your organization's program is 1) of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and (2) uses instructional practices that include the essential components of reading instruction; 240
6. Whether your organization's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice;
7. Whether your organization's activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;
8. Whether your organization's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
9. Whether your organization's activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means;
10. Whether your organization's activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;
11. Whether your organization's activities offer flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;
12. Whether your organization maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with question 4 above) and to monitor program performance; and

13. Whether the local areas in which your organization is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Regarding the federal money ODCTE receives: up to 12.5 percent is allowed for Leadership activities; 5 percent of the Federal money is allowed for administrative activities; a minimum of 82.5 percent of the Federal money must be distributed to grantees/

1. Allocation for correctional programs are subtracted from the money distributed to grantees (minimum of 82.5 percent) prior to allocating monies to local grantees. The total amount allocated to correctional programs may be up to 20 percent of the 82.5% of the total grant award (this may be up to 16.5% of the total award that is allowed for corrections education).

2. The remaining balance (after corrections) of the minimum of 82.5% is the amount to be allocated to local grantees.

ODCTE staff will determine an allocation amount for each ABE service area by using demographic data for each of Oklahoma's 77 counties. This allocation for each ABE Service Area will include the number of eligible individuals within a service area. This will include individuals 18-24 years of age and individuals 25+ years of age that do not have a high school diploma or its recognized equivalent. A formula will then be determined using these two variables to determine an allocation amount for each county. The amount for each county within an ABE service area will be totaled, and eligible providers will compete for up to this amount in their application. Multiple service providers may be selected within an ABE Service Area based on funding requested on dollars available. Eligible providers will determine a budget for providing services in the service area(s) requested and the ODCTE will evaluate these budgets. Awards may be based on multiple factors including reasonableness of the budget relative to the service area, quality of the eligible provider application, and results from the pre-award risk assessment. The amount received by eligible recipients will be held steady for not more than three years. After this period allocation amounts for each service provider will be determined using a formula that accounts for the eligible individuals in an ABE service area, performance of the service provider, and provider need. Each ABE service provider may, at the discretion of ODCTE and based on past eligible provider expenditures and need, receive a minimum allocation of \$50,000 (combined federal and state funds). This minimum allocation does not include any funds for corrections education or integrated English literacy and civics education. The following may be used to calculate the allocation after the hold steady period:

1) Up to fifty percent may be used toward provider need,  
2) Up to seventy percent of the base money may be allocated based on the total number of fundable students each program served in the hold steady period of up to three years. Fundable students are defined as meeting the following criteria:

- Educational funding level to be tracked for educational gain during 12 or more attendance hours;
- A pre-assessment score for the fiscal year that places them in a National Reporting System (NRS the fiscal year;



- A per fundable student dollar amount will be calculated by dividing the total number of fundable students in the state (two years prior to allocation year) into the seventy percent dollar amount.

3) Up to forty percent of the base money is allocated based on program performance points earned by each program two years prior to the allocation year. Performance points include the following:

- Meeting or exceeding the state's target goal percentage in each NRS educational functioning level - total of 11 points;
- Meeting or exceeding the state's target goal percentage in each NRS Core performance area (obtaining a high school equivalency diploma, entering postsecondary education/training, entering employment, retaining employment) - total of 4 points;
- Meeting or exceeding the state's target percentage of 60 percent for students receiving a pre- and post-assessment score within the fiscal year - total of 1 point. The total percentage for each of these three variables (performance points, number of fundable students, and provider need) will equal 100%.

The ODCTE may allocate funds to each service provider based on an ABE service provider meeting negotiated performance levels. Service providers not meeting negotiated performance levels may see a reduction in their allocation for the following year. Those service providers meeting or exceeding their performance levels may be eligible for an increase in their allocation in their funding for the following year from the pool of funds not allocated to those providers not meeting performance levels. Performance funding will be based on the average of two years of performance data. The ODCTE may limit the carryover of an ABE service provider. The carryover limit may not exceed 75% of their projected allocation for the upcoming year. The overage will then be redistributed to other service providers below the 75% carryover limit.

## **Special Rule**

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

## **c. Corrections Education and other Education of Institutionalized Individuals**

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will

fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Oklahoma may fund academic programs for Adult education and literacy activities; Special education, as determined by the eligible agency; Secondary school credit; Integrated education and training; Career pathways; Concurrent enrollment; Peer tutoring; or Transition to re-entry initiatives and other post release services with the goal of reducing recidivism. Adult education and literacy classes will be provided in correctional facilities. Instructional strategies for this population will include:

- academic programs which teach basic skills in reading, writing, and math
- adult secondary programs leading to a High School Equivalency or its equivalent
- workplace education programs which teach job-specific basic skills related to the offenders' job assignments in the correctional facilities
- instruction in job readiness
- life skills and self-esteem
- English literacy Since it is recognized that a large number of offenders may have a learning disability, students may be screened for learning disabilities using the Payne Learning Needs Inventory or other screening instruments, if it is deemed appropriate by the instructor.

Other institutionalized adults may include those in mental institutions, juvenile detention centers, and drug abuse and treatment centers. Strategies for these adults will include teaching basic skills and literacy in the contexts of real-life situations, such as life skills, self-esteem, employment, and citizenship.

The ODCTE has partnered with the Oklahoma Department of Corrections and has established 11 Skills Centers within correctional facilities that provide career and technical training opportunities to incarcerated individuals. Adult Basic Education is offered in most of these correctional facilities that also offer career and technical training programs. This allows funding to be provided that support Adult education and literacy activities, Integrated education and training, Career pathways, concurrent enrollment, and transition to re-entry initiatives and other

post release services with the goal of reducing recidivism. The ODCTE will provide funds to correctional institutions and institutions that wish to provide services to criminal offenders and juveniles in detention centers. The ODCTE provides state funds that are used to fund the CareerTech training programs in the skills centers within these correctional facilities, however federal ABE funds are used to support the Adult Basic Education activities in many of the correctional institutions.

During our forty-plus years of serving incarcerated offenders in Oklahoma, Skills Centers have evolved from a division with a few occupational training programs to a large school system with a multitude of programs and services for both adult and juvenile offenders. The school system began at the Jim E. Hamilton CareerTech Skills Center inside the Jim E. Hamilton (formerly Ouachita) Correctional Center at Hodgen, Oklahoma. Today, the Skills Centers offers services in state correctional facilities, juvenile detention facilities and community correctional facilities.

A successful transition from corrections to the workplace can mean a life of success for ex-offenders. To prepare offenders for successful transition, career and technical education, employability and life skills are integrated into this educational delivery system. Skills Centers students may seek certifications recognized by both state and national industries. Career Readiness Credentials (CRC) may be secured documenting work readiness skills many business and industry employers seek. The Skills Centers provides students with numerous interconnected and integrated components, each an integral part of preparing offenders for success in the workplace and in society. The Skills Centers works in conjunction with the Oklahoma Department of Corrections (DOC) and Oklahoma Correctional Industries (OCI) to offer a U.S. Department of Labor, Bureau of Apprenticeship and Training, registered apprenticeship programs for offenders in Cabinetmaking.

Allocation for correctional programs are subtracted from the 82.5 percent prior to allocating monies to local grantees. The total amount allocated to correctional programs may be up to twenty percent of the 82.5% of the total award. Funding method and considerations for Corrections will ensure equitable access and consideration for all eligible providers. The Corrections funding process will be conducted separately, and additional consideration will be given to how the applicant plans to integrate correctional programming. ODCTE will conduct an open competition for new grants to be awarded July 1, 2018. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers. The grant application will contain the local application criteria listed in Section 232 of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy as well as other criteria. Each applicant will fill out the same application. This will ensure direct and equitable access to all eligible providers. Applications will be reviewed by a panel selected by the ODCTE. A rubric will be developed and evaluation criteria will include the 13 considerations in 231(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy, as well as other components deemed necessary to review the application.

#### **d. Integrated English Literacy and Civics Education Program**

**1. Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities.**

English Literacy: The purposes of English literacy instruction are to: 1. Assist adults whose native language is other than English and who have limited English proficiency to increase their ability to speak, read, write, and understand the English language; 2. Assist adults with limited English proficiency in obtaining the literacy and basic skills necessary to compete in the workplace, become self-sufficient, and exercise the rights and responsibilities of citizenship. The key elements of English literacy instructional programs include the following: a. Classroom Environment: Classroom environments that are non threatening will be provided in order to facilitate the second language acquisition process and to enhance self-esteem and teamwork; b. Instructional Strategies: English language skills will be taught in the real-life contexts of the workplace, the family, and the community to ensure that limited English speaking adults acquire the English language survival skills needed in a variety of work, academic, and social settings; c. Assessment: Students' listening, speaking, reading, and writing skills will be assessed using the Basic English Skills Test (BEST) or other formal ESL assessment instruments. The pre- and post-assessments will establish baseline and progress data in order to meet the core indicators of performance as identified in Section 5.0 of the State Plan. d. Goal Setting: English literacy students will be assisted in setting realistic goals based on the initial assessment of their skills and on their personal goals; e. Citizenship Instruction: Students will be provided with English language and citizenship instruction necessary to successfully complete the citizenship application and interview process where appropriate.

**2. Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.**

Funding method and considerations for IELCE will ensure equitable access and consideration for all eligible providers. The IELCE funding process will be conducted separately, and additional consideration will be given to how the applicant plans to integrate IELCE programming.

ODCTE will conduct an open competition for new grants to be awarded July 1, 2018. The grant application will address the thirteen considerations established in Title II. The competition will be open to all eligible providers. The grant application will contain the local application criteria listed in Section 223(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy. Applications will be reviewed by the local workforce development boards and ODCTE staff. A rubric will be developed and evaluation criteria will

include the 13 considerations in 223(e) of the Workforce Innovation and Opportunity Act Title II Adult Education and Literacy, as well as other components deemed necessary to review the application. Each applicant will fill out the same application. This will ensure direct and equitable access to all eligible providers.

The ODCTE will fund IELCE in conjunction with an integrated education and training activities. Components funded within this program are adult education and literacy activities, workforce preparation activities, and workforce training. Funds for IELCE will be used for the cost of educational services provided to English language learners who are adults, including paraprofessionals with degrees or credentials in their native countries, that enable such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. IELCE programs will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. IELCE programs will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; and integrate with the local workforce development system and its functions to carry out the activities of the program. The integrated education and training activities will include a balance of instruction across two areas: Civics Participation and Citizenship preparation, and will deliver the components simultaneously, and use occupationally relevant instructional materials. A single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce competencies will be established.

The two areas are outlined below:

Civic Participation: This program supports the design, creation, implementation and delivery of instructional activities that integrates civics education content with ESL instruction. This program connects literacy to the lives of learners and reflects their experiences as community members, parents and participants in the community and workforce system. Through these programs, adults understand and deal with social issues through community research projects, collecting and analyzing information, and interpreting findings that provide a direct connection to classroom learning with personal knowledge and community experience.

Citizenship Preparation: This program uses ESL best practices, methodologies and citizenship preparation material to prepare learners to take and pass the USCIS written and oral citizenship test. The program includes outreach services, skills assessment, curriculum development and instruction, professional development, naturalization preparation and assistance and program evaluation.

### **3. Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English**

**language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.**

Eligible providers will deliver IELCE activities in combination with IET activities. Integrated education and training is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

The delivery of IELCE activities in combination with IET activities must meet the following criteria: Have been planned and developed in conjunction with the Local Workforce Board, are approved by ODCTE, and provide adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Workforce training may include: (i) occupational skill training...; (ii) on-the-job training; (iii) incumbent worker training...; (iv) programs that combine workplace training with related instruction...; (v) training programs operated by the private sector; (vi) skill upgrading and retraining; (vii) entrepreneurial training; (viii) transitional jobs...; (ix) job readiness training provided in combination with services...(i) through (viii); (x) adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and (xi) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

**4. Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.**

Eligible providers will develop partnerships with business, industry and the Local Workforce Development Boards to provide Adult Education and literacy activities concurrently and contextually with both, workforce preparation activities, and workforce training in collaboration with employers designed to improve the productivity of the workforce as well as educational and career advancement for the eligible individual. Furthermore, eligible providers will coordinate with local workforce partners to identify in-demand industries and occupations, create appropriate education and training, and place them in unsubsidized employment in those identified occupations.

Eligible providers will encourage IELCE participants to co-enroll into local workforce development system partners. This co-enrollment will allow all WIOA partners to provide the unique services that each specialize in eliminating duplication. This will allow the participant to have improved access to activities leading to recognized post-secondary credentials including industry-recognized certificates, and portable, stackable credentials. Furthermore, co-enrollment increases the options for a worker's pathway to career advancement.

## **e. State Leadership**

### **1. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.**

ODCTE administers and monitors federal and state adult education and literacy funds to local providers and provides program development and training activities in order to assure quality basic skills services for all students across the State.

12.5 percent of the Federal money is allowed for Leadership activities; 5 percent of the Federal money is allowed for administrative activities; 82.5 percent of the Federal money must be distributed to grantees. All funded providers will be required to detail the process that will be used to collaborate with all stakeholders and align adult basic education programming with all core and combined partners. Eligible providers will provide services in alignment with local plans detailing how they will promote concurrent enrollment with Title I programs and activities in order to meet the state adjusted levels of performance and collect data to report on performance indicators. In addition, all providers will describe how they will fulfill one-stop responsibilities in their region. The following activities are ongoing in Oklahoma in preparation to meet the new requirements:

1. The alignment of adult education and literacy activities with other core programs and one-stop partners: The implementation of strategies identified in the state plan and the development of career pathways to deliver access to training and employment services for individuals involved in adult education programs. ODCTE ABE staff meet regularly with other core partners in aligning adult basic education activities with the activities of the core partners. These meetings are used to establish policies and guidance for the workforce development boards in implementing these policies. Such policies will provide the guidance necessary in the implementing career pathways and allowing individuals access to employment and training services for individuals in adult education and literacy activities. ODCTE staff currently serve on the statewide Career Pathways committee that includes individuals from business and industry, technology centers, higher education, and adult basic education.

2. The establishment and operation of high quality professional development programs: Oklahoma may provide state administration funds annually for each ABE provider to participate in high quality professional development of their choosing. The state will reimburse each provider for these activities. The state will also provide professional development utilizing conference calls, regional meetings, webinars, and other means. Professional development topics to be covered may include areas suggested by the ABE service providers as well as areas necessary for the advancement of adult education in Oklahoma. These areas may include best

practices in instruction, classroom management, learning disabilities for adults, retention of students, blended learning, interactive pedagogy, and best practices for ESL in teaching multilevel ESL classroom,

3. Technical assistance will be provided to eligible providers and may include 1) assistance in the use of technology, including for staff training to eligible providers especially the use of technology to improve data collection efficiencies, 2) the development and distribution of instructional practices based on the most current and valid research available, 3) student retention, 4) budget and claims, 5) student records, and 6) providing guidance to eligible providers as they fulfill their role as one-stop partners in providing access to employment, education, and training services. ODCTE staff will regularly meet on-site with eligible providers to assist these providers in these and other areas.

4. Monitoring and evaluation of adult education and literacy activities will be conducted through program monitoring visits for each provider and ongoing technical assistance. Regular fiscal reviews for all funded programs will also be conducted. The ODCTE will follow its risk assessment policy and its monitoring policy. Monitoring visits will regularly be conducted to check student records and other data, support for the ABE program by the organization, staff development, instruction and curriculum, testing, and other areas. Professional development activities will be evaluated utilizing a survey instrument issued by ODCTE staff. The survey utilized will assist the ODCTE in evaluating its professional development activities through by allowing feedback from eligible providers. This feedback will be used to improve future professional development activities as well as assist the ODCTE in determining future professional development topics.

## **2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.**

ODCTE will use 12.5 percent of its federal allocation for adult education and literacy for statewide leadership activities. The following state leadership activities may be conducted annually:

I. ODCTE will offer year-round adult education teacher training workshops in order to improve the quality of instructional programs for adult learners. Adult education teachers will be required to attend at least one teacher training workshop during each program year.

1. Supporting Adults with Learning Disabilities and other Learning Differences
2. Developing and Implementing Work-based Education Programs
3. Integrating Work-based Education into the Adult Education Classroom
4. Implementing a Comprehensive Family Literacy Program Family literacy training
5. Teaching English as a Second Language (ESL) Training



6. Assessment of Adult Learners Workshops on using the Tests of Adult Basic Education (TABE) will be offered. This training will assist teachers in administering standardized tests, interpreting test results, and using test results to plan instructional programs for adults.

7. Assessment of Limited English Speaking Adults Training on the use of the Basic English Skills Test (BEST), a standardized assessment for ESL students, will be provided for English literacy teachers.

8. The LiteracyPro System Oklahoma's state-adopted Management Information System, LiteracyPro, provides local adult education and literacy programs the capacity to report participant outcomes and to monitor program performance against ODCTE's performance measures. Training will be offered to local program providers in the continued use of LiteracyPro for maximum effectiveness in reporting participant outcomes and program performance.

9. Technology Training

10. Other Topics for Professional Development as identified by surveying adult basic education providers.

II. ODCTE will provide technical assistance and support to local adult education and literacy programs in the following areas: Pre/post-assessment and student performance data collection;

1. Use of the LiteracyPro System, the state-adopted Information Management System;

2. Strategies and screening for adults with learning disabilities;

3. Implementing family literacy programs;

4. Implementing work-based education programs;

5. Coordination with the local One-Stop Centers;

6. Integrating adult education and literacy activities with job training programs;

7. Promoting linkages with employers;

8. Other areas, as needed. A variety of activities will be used by ODCTE in providing technical assistance and support to local programs. These activities include on site and telephone technical assistance, conducting staff development workshops, collecting and disseminating information on best practices in family literacy, workplace education, supporting adults with learning disabilities, and job readiness, and facilitating local planning sessions with One-Stop providers, employers, and job training providers.

III. The monitoring and evaluation of the quality of, and the improvement in, adult education and literacy activities. ODCTE will monitor the adult education and literacy activities through on site visits periodically throughout the program year. Monitoring activities will ensure that valid and reliable student performance data is being collected and reported. It will also ensure that instructional programs are being carried out in accordance with the approved applications and with the previously-established Indicators of Program Quality. In addition, ODCTE will develop a self-evaluation instrument for use by local program providers. This instrument will enable local

providers to evaluate their own performance based upon the criteria for funding as described in Section 6.5 and upon Oklahoma's Indicators of Program Quality.

IV. ODCTE plans to provide a limited number of incentive grants for adult education and literacy programs. The funding will go toward expanding current services, providing services in areas of need in adult basic education, and/or implement and/or upgrade instructional training and training technology.

V. Other activities of statewide significance which promote the purpose of the Adult Education and Family Literacy Act will also be supported as part of the State Leadership Activities. These may include such activities as statewide marketing of the adult education and literacy program, the publication of the Adult Education and Literacy Review, support for the State Workforce Development Board, support for screening for adults with learning disabilities and other adult literacy related activities.

## **f. Assessing Quality**

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

ODCTE will evaluate annually the effectiveness of adult education and literacy programs. The annual evaluation is designed to measure the ability of local programs to meet or exceed the established performance levels based on the federal and state Core Indicators of Performance as well as their ability to reach high standards related to Oklahoma's Indicators of Program Quality and the criteria for funding. Annual evaluation activities will include the following:

1. Performance results achieved on each of the federal and state Core Indicators of Performance will be compiled and compared to the ODCTE's performance levels negotiated with the United States Department of Education. Progress towards meeting the levels of performance will be tracked through the LiteracyPro Management Information System (MIS) which has been adopted for use statewide by Oklahoma's adult education and literacy programs. LiteracyPro allows local programs to collect, compile, and report student identification and demographic information, contact hours, placement level at program entry, learning goals, pre and post testing information, student progress and follow-up, and other needed information. ODCTE will build on the National Reporting System (NRS) pilot to identify strategies that local providers can use to obtain follow-up information in students who leave the program and obtain employment, retain employment or job advancement, enter post-secondary education or job training programs, and/or obtain a high school equivalency. These strategies may include sampling techniques which conform to ODCTE's specifications as identified in the annual performance report and approved by the Office of Management and Budget.
2. On-site evaluations of at least four local programs will be conducted annually. The on-site evaluations will be conducted by a review team consisting of state adult education and literacy

staff members, local adult education professionals and/or Title I partners, if appropriate. The on-site evaluations will consist of an entry interview with the local program directors and one or more adult education teachers, a review of documentation which supports the Core Indicators of Performance, the Indicators of Program Quality, and the criteria for funding, visits to adult education classes, student interviews, and an exit interview. Based on the findings of the on-site evaluation, a final evaluation report detailing program strengths and recommendations for improvement will be completed for each program reviewed.

3. ODCTE will perform desk-top monitoring of all local adult education and Literacy programs throughout the entire fiscal year. Based on any potential non-compliant findings of the desktop monitoring, on-site evaluations will be conducted. Monitoring and evaluation of adult education and literacy activities will be conducted through program monitoring visits for each provider and ongoing technical assistance. Regular fiscal reviews for all funded programs will also be conducted. The ODCTE will follow its risk assessment policy and its new monitoring policy. Monitoring visits will regularly be conducted to check student records and other data, support for the ABE program by the organization, staff development, instruction and curriculum, testing, and other areas.

4. The development and implementation of professional development based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training will be provided throughout the state. An annual needs assessment will assist in determining PD offerings. The ABE division of the ODCTE will evaluate the professional development through informal and formal surveys and student data to evaluate effectiveness. The surveys utilized will assist the ODCTE in evaluating its professional development activities by allowing feedback from eligible providers. This feedback will be used to improve future professional development activities as well as assist the ODCTE in determining future professional development topics.

## **ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES**

### **Certifications**

States must provide written and signed certifications that

1. The plan is submitted by the State agency that is eligible to submit the plan.
2. The State agency has authority under State law to perform the functions of the State under the program.
3. The State legally may carry out each provision of the plan.
4. All provisions of the plan are consistent with State law.
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan.
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan.
8. The plan is the basis for State operation and administration of the program.

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement).
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA.
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA.
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program; and
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).

## **Section 427 of the General Education Provisions Act (GEPA )**

Instructions: In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions.

### **NOTICE TO ALL APPLICANTS**

The purpose of this enclosure is to inform you about the following provision in the Department of Education's General Education Provisions Act (GEPA) that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

### What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve to high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

### What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

- (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.
- (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.

(3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concern of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students

#### Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email [ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov) and reference the OMB Control Number 1894-0005.

## **Vocational Rehabilitation**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan\* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

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\* Sec. 102(b)(D)(iii) of WIOA

## **a. Input of State Rehabilitation Council**

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

### **1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;**

The Oklahoma Rehabilitation Council (ORC) was established in 1993 as mandated by the 1992 Amendments to the Rehabilitation Act. Its Mission is to facilitate consumer education and empowerment, to assure services are of high quality and lead to employment of individuals with disabilities within the state of Oklahoma.

The ORC acknowledges and commends the efforts of the Oklahoma Department of Rehabilitation Services (DRS) toward proactively serving additional clientele, even when they face challenges during an Order of Selection or when faced with high Counselor turnover due to the difficulties related to hiring Counselors in rural settings. ORC also appreciates the collaborative efforts and communication between the Agency and the Council; we look forward to continuing a positive relationship and to promoting increased and meaningful employment opportunities for individuals with disabilities.

In order to accomplish its Mission in 2019, ORC collaborated with the DRS Process Improvement (PI) Unit and developed a revised version of the Open Case Survey. This newly revised version included specific changes to ensure accessibility to all VR/SBVI clientele. The Open Case Survey is provided to Vocational Rehabilitation (VR) and Services to the Blind and Visually Impaired (SBVI) clients age 18 and over, in an active case status, for whom an Individual Plan of Employment (IPE) has been completed and evaluates the overall satisfaction. The results were very positive indicating an overall combined satisfaction rate for VR and SBVI of 83.4%.

The ORC also collaborated with DRS and held five Focus Groups to gather information for the Statewide Assessment. The information received was later used to create a new survey for DRS Counselors that was conducted in December 2018. Responses were shared with the Council.

### **Council Recommendation**

The ORC will use the results of the of the two surveys mentioned before to identify a primary recommendation based on its function to review, analyze, and advise the Agency regarding performance of its responsibilities.

### **Recommendation 1: Increased Opportunities for Public Awareness of Vocational Rehabilitation Service Delivery**

The ORC is aware of positive efforts the Agency has made to acquire additional clientele; however, many Oklahomans are not yet aware of the helpful employment-related services DRS provides. In order to increase public awareness efforts statewide, the Council recommends that DRS participate in various community activities such as health fairs, job fairs and conferences (as applicable), as well as continue to strengthen the Social Media presence in all platforms and to create internet-based ads with information about services provided through the Agency.

- (1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.
- (2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.
- (3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.
- (4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concern of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students

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## **Vocational Rehabilitation**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan\* must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

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\* Sec. 102(b)(D)(iii) of WIOA

### **a. Input of State Rehabilitation Council**

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

#### **2. the Designated State unit's response to the Council's input and recommendations; and**

The DSA concurs with the State Rehabilitation Council's input and recommendation to continue outreach efforts that increase public awareness of DSA employment related services. The DSA organizes and participates in multiple outreach events each year that include: Career Expos, Resource fairs, Assistive Technology Open house, People with Disabilities Awareness day, Job fairs and much more. In addition, the DSA maintains a long-standing partnership with the Oklahoma Association of Broadcasters whose TV and radio stations broadcast DSA program public service announcements regularly. The SRC's partnership is vital to the DSA to expand public awareness of disability issues, disability related events and promoting the services the DSA can provide. The DSA continues to maintain a cooperative, productive and interactive relationship with the Oklahoma SRC. The DSA appreciates the Council's collaboration and partnership to continually improve relationships with consumers and bring awareness to how quality vocational rehabilitation services impact Oklahoman's with disabilities, their communities and state.

#### **3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.**

This is not applicable.

## **b. Request for Waiver of Statewideness**

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

### **1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;**

The Oklahoma Department of Rehabilitation Services is not requesting a waiver of statewideness.

### **2. the designated State unit will approve each proposed service before it is put into effect; and**

This is not applicable.

### **3. requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.**

This is not applicable.

## **c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.**

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

### **1. Federal, State, and local agencies and programs;**

#### **Thunderbird and Crossroads Clubhouses**

The DSA maintains contracted agreements with the Thunderbird Clubhouse in Norman and Crossroads Clubhouse in Tulsa, both of which are certified through the International Center for

Clubhouse Development (ICCD). The contractual agreements are for establishing employment services for DSA clients with severe mental illness for the purpose of obtaining or maintaining employment. The DSA agrees to provide payment of up to \$52,500.00 upon satisfactory performance for establishing new-employment related programs for people with severe mental illness who are eligible to receive assistance through the DSA and other services outlined in the agreements.

## **2. State programs carried out under section 4 of the Assistive Technology Act of 1998;**

### **Oklahoma ABLE Tech (ABLE Tech) (Oklahoma's AT Act Program)-**

As the federally funded Assistive Technology Act Program for the State of Oklahoma, the mission of Oklahoma ABLE Tech is to get assistive technology 'AT' into the hands of Oklahomans with disabilities through activities that provide increased access and acquisition. The DSA has a long standing history of working closely with Oklahoma ABLE Tech to enhance the provision of assistive technology services across the state.

Memorandum of Understanding: The DSA and Oklahoma Able Tech, Oklahoma's AT Act Program have an agreement to provide programmatic technology accessibility details regarding the DSA Access for All initiative under the Workforce Innovation and Opportunity Act (WIOA).

Scope of Work: The DSA is leading the Oklahoma Workforce System towards enhanced accessibility. The DSA initiative of Access for All was adopted by the workforce system statewide. This initiative is in partnership with Oklahoma Able Tech within programmatic accessibility, with a goal of creating fully accessible workforce services for Oklahoma job seekers.

DSA Responsibilities: The DSA agrees to provide payment for satisfactory performance of services outlined.

Partner Responsibilities: Oklahoma Able Tech will:

1. continue outreach to other System Partners such as Oklahoma Career and Technology Education and OSU OKC; and the Oklahoma Employment Security Commission.
2. provide technical assistance to the state Workforce Office regarding technology accessibility of a new website for the Oklahoma Works initiative to ensure that Oklahomans with disabilities can fully access all workforce resources contained on the website, which is designed to connect employers, employees and job seekers to information and programs that help build Oklahoma's workforce;
3. continue with creation of employment-related tips and fact sheets;
4. continue the train-the-trainer model with DSA employee representatives on Local Workforce Boards, one-stop operators and other core partner personnel to

build capacity regarding Access for All initiatives with particular focus on the Access for All Certification process utilizing the Roadmap for Physical and Technology Accessibility Standards; A monthly webinar format will be utilized to complete this contract deliverable.

5. provide training to the Workforce System on the Access for All Certification process utilizing the Roadmap for Physical and Technology Accessibility Standards; A face to face training format will be utilized across the established Workforce regions in Oklahoma during the first quarter of PY18. This training and technical assistance will support the American Job Center's efforts in receiving both physical and technology certification under the Access for All initiative.

6. present the TechAccessOK Conference - the second in a series of annual technology accessibility conferences for web developers, policy administrators, purchasers, etc., to assure public accessibility of OK agencies, higher education institutions and the career and technology education centers;

7. implement a series of surveys developed by the national LEAD Center to assess the experience of:

- Job seekers
- Employers
- American Job Center staff

to determine their readiness and satisfaction with employers and the Oklahoma Works Workforce Development System;

\*The LEAD Center is a collaborative of disability, workforce and economic empowerment organization dedicated to improving employment and economic advancement outcomes for all people with disabilities — funded by the Office of Disability Employment Policy, U.S. Department of Labor.

8. Continue to work collaboratively with DSA to provide technical assistance and support to ACT regarding the accessibility of web-based versions of the ACT test and WorkKeys assessments in an effort to remove technological barriers for both students and job seekers with disabilities; Accessibility standards have been defined by the World Wide Web Consortium (W3C) Web Accessibility Initiative (WAI). The ultimate goal is to allow students and job seekers to participate independently and in the most integrated setting possible in compliance with non-discrimination provisions.

9. Oklahoma ABLE Tech will use a new, enterprise-level automated accessibility testing tool from WebAIM called WAVE Plus. This testing platform will crawl through websites and run tests on entire sites or site subdomains. The platform will provide a detailed report of the accessibility barriers that it identifies, with specific details about where the barrier is identified, the nature of the barrier and relevant accessibility standards. In turn, Oklahoma ABLE Tech will provide this report to

entities that own the website or web application and work with those entities to understand the findings documented in each report. Oklahoma ABLE Tech will also work with entities on remediation planning and, where necessary and/or desired, additional testing or technical assistance.

\*It is important to note that the WAVE Plus tool is new and that specific features may change. In turn, work under the Oklahoma Works Workforce System Access for All initiative will help to shape the features and function of WAVE Plus for future users.

Use of this testing platform will be available to DSA and other core programs under WIOA to ensure statewide compliance with electronic and information technology accessibility (EITA) training and technical assistance. ABLE Tech staff will continue collaborative efforts with the Office of Management and Enterprise Services (OMES) under Oklahoma's EITA Law.

### **3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;**

No interagency agreement reached at this time, however, discussions are under way.

### **4. Noneducational agencies serving out-of-school youth; and Oklahoma Office of Juvenile Affairs**

The DSA partners with the Office of Juvenile Affairs (OJA) to co-locate a VR counselor within the Central Oklahoma Juvenile Center and the Southwest Oklahoma Juvenile Center to work with youth with disabilities. The DSA also partners to co-locate a VR counselor who is dedicated to working within OJA facilities and through the Oklahoma Department of Human Services facilities including group homes, short-term and long-term facilities, and treatment centers. Vocational Rehabilitation Counselors connect with youth upon intake, encourage application at appropriate ages, complete vocational evaluations, and provide additional services to youth transitioning out of the facilities and work closely with the Office of Juvenile Affairs to assist youth with accessing resources needed to increase their chances of successful employment and decrease the recidivism rate upon release.

## **5. State use contracting programs.**

The State of Oklahoma recognizes the value of people with significant disabilities by an established State Use Program that provides jobs for people with significant disabilities in producing products and services that can be purchased from a state contract for state use. The jobs range from products sorting and repackaging to the provision of services such as janitorial, maintenance, security, lawn care, and trash pickup. Each vendor in the State Use program must demonstrate that a minimum of 75% of their work force is comprised of persons with severe disabilities. By state statute, the administrator of the Services to the Blind and Visually Impaired or a representative designated by the administrator serves on the executive committee of the Oklahoma State Use Program. Currently, this committee position is held by the contract monitor for non-medical vendors to the DSA whom engage in a strategic role that encourage vendors to increase competitive integrated employment, develop relationships and outreach and review data for potential improvements. The State Use Program maintains a recognized portal system for purchasing. All state agencies are required to purchase off of the portal contract before seeking goods or services elsewhere.

### **d. Coordination with Education Officials**

Describe:

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The DSA maintains a formal interagency agreement with the State Educational Agency (SEA) as well as relationships at the local level with LEAs. The focus of our work will be to forage those relationships and partner with stakeholders to provide services to youth and students with disabilities to help them prepare for life after high school, including, but not limited to, further education/training, competitive integrated employment, independent living and social skills, self-determination, and self-advocacy. The DSA continues to perform outreach to underrepresented groups, such as those on Section 504 Plans, youth in foster care, adjudicated youth, out-of-school youth, and those with other disabilities not documented on a 504 or IEP. As of October 1, 2019, the DSA has updated transition and pre-employment transition policies.

### **Overview of transition from school to work services**

Transition services is a coordinated set of activities for a student that promotes movement from the public schools to post-school activities. The Individuals with Disabilities Education Act (IDEA) and the Rehabilitation Act use the same language to describe transition services and their purpose. No break in required rehabilitation services will occur for eligible students exiting the secondary school when a case has been opened while in high school. The transition process is outcome based, leading to post-secondary education, vocational

training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, and/or community participation consistent with the informed choice of the individual. The goal of the Transition from School to Work Program is to help eligible individuals with disabilities make the transition from school to work in order to function as a productive member of society.

The Transition from School to Work Program is implemented through a cooperative agreement between the DSA and each participating local secondary school district, private school, charter school, home school organization and Career and Technology Education Center, through an MOU with the State Department of Education. The Transition Coordinator in the DSA acts as the liaison with the State Department of Education, and provides statewide coordination and technical assistance for the Transition from School to Work Program.

Transition services must be based on the individual student's needs, taking into account the student's preferences and interests. Transition planning will include, to the extent needed, services in the areas of:

- instruction
- community services;
- employment and other post-school adult living objectives, including job skill training available through vocational-technical schools;
- acquisition of daily living skills and a functional vocational evaluation;
- supported employment services can be initiated during the final graduating semester of high school; and
- other needs specific to the individual.

The Transition from School to Work Program is based upon effective and cooperative working relationships between the Special Education Section of the State Department of Education, the DSA, and the Local Educational Agency. Each agency retains responsibility for providing or purchasing any transition service that the agency would otherwise provide to students with disabilities who meet the eligibility criteria of that agency [34 CFR 300.520].

### **Subminimum Wage for Youth with Disabilities**

DSA must provide documentation in collaboration with the local school district of specific services to youth ages 14-24 if those individuals are known by the DSA to be seeking subminimum wage work. This documentation must be provided as soon as possible but no later than 45 days after services are completed, or 90 calendar days, if additional time is necessary due to extenuating circumstances which should be interpreted narrowly.

The documentation must include the following:

- (1) Pre-Employment Transition Services provided by the school and/or DSA as applicable;

- (2) Application for DSA where they are found eligible or ineligible;
- (3) Youth had an approved IPE with a competitive integrated employment goal;
- (4) Youth with a disability was unable to achieve the employment outcome specified in their IPE and has a closed case with DSA;
- (5) Youth received career counseling, and information and referrals from the DSA to other Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports to enable the individual to explore, discover, experience, and attain competitive integrated employment.

#### Pre-Employment Transition Services

(a) Students with a Disability. Vocational Rehabilitation (VR) must collaborate with local educational agencies (LEAs) to provide, or arrange for the provision of, Pre-employment Transition Services (Pre-ETS) for all students with a disability in need of such services.

(1) A "Student with a Disability" as defined in Oklahoma is ages 16 through 21 and eligible for and receiving special education or related services under an Individualized Education Program (IEP); or an individual with a disability for purposes of Section 504 (individual does not need to have a 504 plan to meet the definition requirements).

(2) An individual as young as 14 years old may be considered a "Student with a Disability" if Pre-ETS is determined necessary by the IEP team.

(3) The definition of "Student with a Disability" applies to all students enrolled in educational programs, including postsecondary education programs or other recognized education programs, so long as they satisfy the age requirements. The definition is inclusive of secondary students who are homeschooled, as well as students in other non-traditional secondary educational programs.

(b) Required Activities. Services may be provided to students, or groups of students, with disabilities who are eligible or potentially eligible for VR services in the following areas:

(1) Job exploration counseling.

(2) Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting, including internships, that is provided in an integrated environment to the maximum extent possible.

(3) Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education.

(4) Workplace readiness training to develop social skills and independent living.



(5) Instruction in self-advocacy, including instruction in person-centered planning, which may include peer mentoring, including peer mentoring from individuals with disabilities working in competitive integrated employment.

(c) Delivery of Services. Pre-ETS may be delivered in collaboration with school districts/LEAs via any combination of:

(1) Vocational rehabilitation counselors

(2) The vocational rehabilitation counselor will coordinate Pre-ETS with other entities who maybe delivering these services.

(3) Other entities contracted with VR such as:

(A) Community Rehabilitation Programs

(B) Independent Living Centers

(d) Considerations under 00S. VR must continue to provide Pre-ETS to students with disabilities who were receiving such services prior to being determined eligible for VS and are placed in a closed category.

(e) Pre-Employment Transition Coordination.

(1) District office staff will be responsible for attending IEP meetings for students with disabilities when invited; using conference calls and video conferences, when necessary;

(2) working with local workforce development boards, job centers and employers to develop work opportunities for students with disabilities, including apprenticeships, internships, summer employment and other employment opportunities available throughout the school year;

(3) working with schools to coordinate and ensure the provision of Pre-ETS; and

(4) attending person-centered planning meetings for individuals with developmental disabilities receiving SSI-D/Medicaid when invited.

available through vocational-technical schools;

(4) acquisition of daily living skills and a functional vocational evaluation;

(5) supported employment services can be initiated during the final graduating semester of high school; and

(6) other needs specific to the individual.

(d) The Transition from School to Work Program is based upon effective and cooperative working relationships between the Special Education Section of the State Department of Education, the Department of Rehabilitation Services, and the Local Educational Agency. Each agency retains responsibility for providing or purchasing any transition service that the agency would otherwise provide to

students with disabilities who meet the eligibility criteria of that agency [34 CFR 300.520].

### **Cooperative agreements for transition services**

Cooperative agreements are entered into by the Department of Rehabilitation Services and the Local Educational Agency (LEA), private school, charter school, home school organization and Career and Technology Education Center to facilitate cooperative working relationships leading to positive employment outcomes for eligible students with disabilities, including those served through an individualized education program (IEP), Section 504 Plan, or those with other documented disabilities. Each agreement sets the framework for a comprehensive and coordinated effort to identify and serve all students with physical and/or mental disabilities enrolled in secondary school or attending CareerTech during secondary school or being home schooled who are jointly eligible. Continuous and uninterrupted services are provided through common areas without duplication or encroachment of the separate programs.

### **Confidentiality of records**

Only the information directly related to the administration of the individual's transition program are to be released to the LEA. The cooperating agencies will allow each other to copy information under guidelines established for participating and/or cooperating agencies under SDE and DSA regulations.

### **Coordination of Individualized Education Program and Individualized Plan for Employment**

The Local Educational Agency and the DSA must document coordination of objectives and services planned in an individual's IEP/Section 504 Plan and IPE. Both documents, as well as other case documentation, must reflect the effective interaction of the two agencies in providing the services necessary for a smooth transition from school to work. While it is understood that it is not possible for a VR counselor to attend all formal IEP/Section 504 Plan meetings in assigned schools, the counselor will collaborate in transitional planning in the most effective manner possible.

## **1. The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students**

**A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

DSA finalized an SEA agreement on July 1, 2018. The formal interagency agreement with the State educational agency provides for: i) consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post- school activities, including vocational rehabilitation services; (ii) transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs under section 614(d) of the Individuals with Disabilities Education Act [20 U.S.C. 1414(d)]; (iii) the roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services; and (iv) procedures for outreach to and identification of students with disabilities who need the transition services.

In response to the federal statutory and regulatory requirements, the SEA and the DSA agree to the following Consultation and Technical Assistance responsibilities:

The DSA will assist the SEA, LEAs, charter, private, virtual, and home school organizations in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services. Consultation and technical assistance may be provided through alternative means, such as conference calls, video conferences, and written communication. Additionally, the DSA will offer such technical assistance to other state agencies and organizations and parents of students and youth with disabilities.

The DSA will provide:

- (1) interpretation of laws pertaining to vocational rehabilitation, employment, and disabilities as it relates to transitioning youth and students with disabilities to life after high school;
- (2) technical assistance documents to assist schools and the SEA in collaboration and provision of transition services to students and youth with disabilities (e.g., forms to document transition services completed to assist with the requirements set forth in WIOA regarding the movement of a youth or student with a disability to subminimum wage employment);
- (3) to the SEA on an annual basis or when requested a list of DSA staff territories by school and county;
- (4) sample goals to be used in the annual transition goal areas of education/training, employment, and independent as developed and revised around the VR services or transition services in general; and
- (5) input on presentation materials, handbooks, data collection and reporting, and as requested by the SEA.

**B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;**

The DSA will coordinate services with local educational agency staff to help prepare youth and students with disabilities for competitive integrated employment. DSA staff will share results of the vocational evaluation and other assessments, as well as progress reports for various work experiences with school personnel for the purpose of including information in the IEP and transition planning process. The DSA will work with school personnel to not only have input into the IEP process but also to access a copy of the IEP for assistance with coordination with the VR IPE.

The DSA and educational officials will provide the following types of services:

Consultation and technical assistance services to assist State educational agencies and local educational agencies in planning for the transition of students with disabilities from school to postsecondary life, including employment.

- Transition services to youth with disabilities and students with disabilities, for which a vocational rehabilitation counselor works in concert with educational agencies, providers of job training programs, providers of services under the Medicaid program under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.), entities designated by the State to provide services for individuals with developmental disabilities, centers for independent living (as defined in section 796a of this title), housing and transportation authorities, workforce development systems, and businesses and employers.

The DSA will assist the SEA, LEAs, charter, private, virtual, and home school organizations in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services. Consultation and technical assistance may be provided through alternative means, such as conference calls, video conferences, and written communication. Additionally, the DSA will offer such technical assistance to other state agencies and organizations and parents of students and youth with disabilities.

DSA will provide interpretation of laws pertaining to vocational rehabilitation, employment, and disabilities as it relates to transitioning youth and students with disabilities to life after high school; technical assistance documents to assist schools and the SEA in collaboration and provision of transition services to students and youth with disabilities (e.g., forms to document transition services completed to assist with the requirements set forth in WIOA regarding the movement of a youth or student with a disability to subminimum wage employment; to the SEA on an annual basis or when requested a list of DSA staff territories by school and county; sample goals to be used in the annual transition goal areas of education/training, employment, and independent as developed and revised around VR or transition services in general and input on presentation materials, handbooks, data collection and reporting as requested by the SEA.

The DSA and OSDE will collaborate on working with VR staff and LEA staff to facilitate completion of a comprehensive and quality Individualized Education Program (IEP) and Individualized Plan for Employment (IPE) that appropriately includes transition planning and coordination of services.

The OSDE will continue to enforce the IDEA requirements regarding inviting those agencies responsible for providing or paying for transition services, including referral to VR at the age of 15 so services can be in place by the age of 16.

The OSDE will:

(1) provide to the LEAs a referral form to VR through the state IEP development system; (2) educate LEAs on the best practices for inviting VR and other transition providers to participate in the development of the IEP and participate through multiple means (e.g., in person, by phone, virtually, by providing documents in advance) in IEP and other meetings; and (3) continue to monitor the involvement of, invitations to, and referrals to VR through the state monitoring system, Indicator 13 checklist, and other means as decided. 3. The ODRS will continue to enforce the WIOA requirements regarding attending IEP and other meetings (when invited) as well as the process for receiving and responding to referrals, including referral to VR at the age of 15 1/2 so services can be in place by the age of 16.

The DSA will:

- Provide to the OSDE the content to be included in the referral to VR form
- Train its staff on the requirements of receiving the referral form along with the release of confidential information from LEAs and other referral sources
  - Train its staff to develop internal procedures with each school for how referrals will be submitted to the local VR counselor
  - Train its staff on best practices for engaging with schools and teams, planning and attending IEP and other meetings, to participate in the development of the IEP and participate through multiple means (e.g., in person, by phone, virtually, by providing documents in advance)
- Train its staff on providing regular updates to the referring source on the status of that referral, if the student/family applied for services, if a plan for employment is in place, what services may be implemented at school, etc
  - Encourage its staff and schools to take advantage of the online VR application to streamline the application process, possibly in lieu of even a referral
  - Continue to educate and encourage its staff to actively contribute to the development of annual goals and coordinated services to be included in the IEP to help the student reach his or her postsecondary goals

- Train its staff to assist schools in developing annual IEP goals around the VR services provided to support the achievement of the IEP and IPE goals; and work with the OSDE and LEAs to improve documentation of the collaborative transition service delivery occurring for a student by encouraging wording in the IEP.

The OSDE will continue to educate LEAs on the required provision of secondary transition services as described in the IDEA, such as: a) Community Experiences,. b) Development of

education/training, employment, and other adult living goals and/or objectives; c) Annual transition assessments; and d) Coordination of services with other agencies who may provide and/or pay for transition services.

The OSDE will ensure LEAs recognize and take into consideration the responsibilities of the LEA to provide such services in preparation for working with VR on services requiring rehabilitation. This includes ensuring schools meet their requirements of providing special education and related services to support the students in reaching their educational goals, including their postsecondary goals. The OSDE will ensure LEAs understand Section 101(c) of WIOA that states "Nothing in the Act is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

The DSA and OSDE will collaborate on ensuring education officials, school personnel, and VR personnel are cross-trained, have opportunities for networking and collaboration, and receive consistent messages and guidance from the DSA and OSDE.

The DSA will continue to coordinate with non-educational agencies to reach out-of-school youth to support them in their employment efforts. This includes collaboration with subminimum wage employers, workforce development boards, Oklahoma Department of Mental Health and Substance Abuse Services, mental health providers, community rehabilitation providers, Oklahoma Department of Human Services, Office of Juvenile Affairs, Oklahoma Parents Center, Oklahoma Family Network, Oklahoma Autism Network, Down Syndrome Association of Oklahoma, and other stakeholders.

The DSA and OSDE will collaborate on performing outreach statewide to identify students with disabilities in need of transition services under IDEA and pre-employment transition services under WIOA, those residing in rural areas, and those low-incidence populations, such as blindness and hearing impairments. The DSA and OSDE will collaborate on joint community and professional presentations to educate and inform LEAs, parents, and others about reaching the needs of youth and students on Section 504 Plans and those with documented disabilities not being

served through an IEP or Section 504 Plan. The DSA will work with the Oklahoma Rehabilitation Council's Transition Committee, Oklahoma School for the Blind, and Oklahoma School for the Deaf to conduct outreach activities. This may include, but is not limited to, developing and disseminating public service announcements, making presentations within these schools and LEAs, hosting events for groups of students with disabilities (e.g., advocacy, STEM).

The OSDE will work with the IDEA B Advisory and LEAs to conduct outreach activities. This may include developing and disseminating public service announcements, making presentations within LEAs, and disseminating written information. For the purposes of Child Find, outreach, and identification of need for transition services and Pre-ETS, the OSDE will provide to the DSA annual special education Child Count data after October 1 (as completed and available) broken down by: county, district name, disability, age, and grade. For the purposes of improving outcomes of students and youth with disabilities, the OSDE will provide annually to the Oklahoma Transition Council data and reports related to Indicators 13 and 14 of the State Performance Plan.

The DSA will provide to the OSDE:

- A list of all LEAs, private schools, charter schools, virtual schools, and Career and Technology Education schools with whom they contract with for School Work Study; Work Adjustment Training; Tech-Now; Project SEARCH; and other transition programs.
- A list of all LEAs participating in summer programs, such as I Jobs, WOW!, STEM Camp, and others.

The DSA collaborates with the OSDE to access information from the Accessible Instructional Materials (AIM) Center located at the Oklahoma Library for the Blind and Physically Handicapped (OLBPH). Such information may include, but is not limited to, students with disabilities accessing services and materials through the AIM Center. The OSDE will purchase materials and equipment for the AIM Center to disseminate as requested by LEAs to assist students with visual impairments and blindness. The AIM Center, through the DSA, will provide to the OSDE assurance they will conduct inventory control with procedures in place to track items in stock, items checked out, items returned, items still outstanding, lost or damaged items, etc. The AIM Center, through the DSA, will provide to the OSDE information regarding: a list of LEAs accessing materials and equipment purchased through the OSDE; and the number of students utilizing the provided materials and equipment.

**C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;**

The DSA and OSDE collaborate to ensure roles, responsibilities, and financial responsibilities between LEAs and DSA are communicated to LEAs and DSA staff to assist in provision of transition services to youth and students with disabilities. LEAs are responsible for providing and paying for any and all services identified as needed for the youth or student that is part of achieving the goals identified on their IEPs and related to their success in school or beyond. Section 101(c) of WIOA makes clear that. "Nothing in the Act is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities."

LEAs are responsible for providing: a) Academic instruction; b) Special education and related services (e.g., speech therapy, occupational therapy, physical therapy, special transportation); c) Accommodations; d) Assistive Technology (AT)

The DSA and OSDE will ensure LEAs and VR staff understand how to document the coordination of and provision of services between the VR counselor and LEA. In the event a dispute should arise regarding whose responsibility it is to pay for or provide a similar transition service, the VR staff and LEA staff may, as an initial step, reach out to the DSA and OSDE Transition Specialists to obtain guidance regarding how to make the decision. Any services required for providing FAPE are the responsibilities of the LEA. To assist teams in making such decisions, the DSA and OSDE recommend the team consider: (1) The purpose of the service; (2) Customary services; and (3) Eligibility.

Because the definition of a "student with a disability," for the VR program includes an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is broader than the definition under IDEA, VR is authorized to provide transition services to this broader population of students with disabilities than LEAs under IDEA. Since the VR program may serve students with disabilities, including those individuals with a disability for purposes of section 504 of the Rehabilitation Act, these students may not have an IEP under IDEA, and, therefore, would not be eligible for or receiving special education and related services under IDEA.

The OSDE continues to educate LEAs on the availability of VR services for students with disabilities on section 504 plans and encourage the referral of such students to the VR counselors. In addition, the Rehabilitation Act also allows the VR agency to provide pre-employment transition services to "potentially" eligible students with disabilities. This may include those students who are not receiving special education and related services under an IEP, students who are not receiving services or accommodations under a section 504 plan, and who have documented disabilities (e.g., a student may wear a hearing aid, have chronic health issues, such as asthma, leukemia, diabetes, suffer from depression, bipolar, and anxiety.

#### **D. procedures for outreach to and identification of students with disabilities who need transition services.**



The DSA will interact with the SEA and LEAs to identify youth and students with disabilities in the public school systems. The DSA will perform outreach to charter schools, virtual educational programs, homeschool networks, and other partners to identify youth and students with disabilities who need transition services. The DSA will utilize annual Child Count information from the SEA to help identify low incidence disabilities across the state.

## **e. Cooperative Agreements with Private Nonprofit Organizations**

Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

### **Community Rehabilitation Service Providers**

DSA has contracts with private non-profit, for-profit, and government Community Rehabilitation Service Providers (CRPs) of Supported Employment and other employment programs for individuals with significant barriers to employment. CRPs request the opportunity to provide Supported Employment, employment and retention (i.e. short term job coaching), job placement, JOBS (short-term placement), work-adjustment training, employment support and transitional employment services for DSA job seekers. DSA approves contracts based on pre-established criteria, including acceptable levels of payment for outcomes achieved.

DSA will continue to increase employment CRPs to meet the needs statewide focusing in rural areas, by initiating a customized employment contract within designated areas across the state. The Employment Support Services Unit (ESS) educates potential CRPs and DSA

field staff of available contracts. The list of contracts and CRPs is available on the DSA intranet.

### **Centers for Independent Living**

The DSA maintains a cooperative relationship with the Centers for Independent Living (CILs) by attending quarterly SILC meetings. The DSA encourages the CILs to provide informative training programs to the DSA field staff to access services available through the CILs. The DSA remains committed to working with the Statewide Independent Living Council (SILC) to improve relationships between the CILs and DSA.

Initiatives include:

- Educate DSA field staff about services available from CIL's.
- Encourage the CILs to communicate with the DSA field staff to determine other services that could be created and provided by the CILs to the DSA.
- Encourage CIL's to market their services to DSA field staff.
- Survey DSA field staff about CIL usage and needs.
- Improve communication between the SILC and DSA.

- Find and/or develop services that will enhance the independent living concerns for consumers.
- Market these services to the DSA's field staff and consumer service professionals for inclusion in case services and plans.
- Continue to educate the SILC about the components, requirements and limitations of the contract and purchasing systems.
- Attendance of Director and/or designee at quarterly SILC meetings.
- Attendance of the DSA director in major SILC and CIL meetings where services are discussed and planned: i.e., creation of the state plan for Independent Living.
- DSA (administration, accounting, and legal) will meet annually (or as needed) with the SILC Executive Board to address issues and difficulties.

## **f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services**

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

DSA enters into contractual agreements with CRPs for the provision of Supported Employment services. There are 39 CRPs with a total of 158 contracts. Assigned staff continues outreach activities in an attempt to recruit new CRPs.

Under the new section 511, the determination of individuals who may benefit from employment services, the DSA has developed contracts with CRP to provide Trial Work Services to establish the ability to benefit from employment services.

DSA maintains an MOA with the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS) describing collaboration on delivery of Supported Employment services and transitional employment services.

The DSA has initiated a pilot project with ODMHSAS and five-community mental health centers to provide individualized career planning and employment to individuals between the ages of 16-25 with serious mental illness.

DSA maintains an MOA with the DDS to improve employment outcomes for individuals with intellectual disabilities. The MOA outlines the coordination of services and identifies the DSA as first dollar funding source for competitive integrated employment. DDS continues to provide extended services for individuals with intellectual disabilities in Supported Employment services by utilizing the DDS Home and Community Based Waiver (HCBW) and DDS state dollars. The HCBW is utilized to provide the long-term ongoing supports. DSA

has maintained an MOA with DDS since 1989. Under the MOA, the HCBW is also utilized to provide pre-vocational services.

## **g. Coordination with Employers**

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

(1) VR services; and

The DSA has formalized a Business Services Program with the capacity to connect and sustain partnerships with Oklahoma businesses by delivering a skilled and loyal workforce. These partnerships will lead to competitive integrated employment and career exploration opportunities for jobseekers with disabilities.

The DSA Business Services Program defines and customizes services for employers, creates strategic partnerships to support workforce needs, and has established an employment-focus within the rehabilitation process.

### **Utilization of Statewide Partners**

The DSA Business Services Program retains local business services specialists that work in geographical areas across the state. The specialists connect with local businesses to deliver a skilled and loyal workforce and partner with local workforce development boards to ensure the workforce system is relevant and useful. Further, specialists always ensure consumers with disabilities are included in the talent pool delivery system.

### **Strategic Alliances & Intel**

The DSA's ability to coordinate with local, state and federal entities is imperative for success. Community and economic development partners are the best link to disseminating the DSA's message to employers. Many of whom are federal contractors, especially in manufacturing. These partners potentially hold the key to the resources necessary in order to facilitate the DSA mission of increasing quality employment opportunities for job seekers with disabilities.

### **Regional Approach**

In order to facilitate a regional approach, the DSA will take advantage of regional alignment of federal and state partners. DSA staff will coordinate with workforce development boards, small business development centers (SBDCs), and local businesses and employers.

### **Internal Coordination**

Dissemination of information and the ability to coordinate and communicate with all DSA field staff responsible for job development activities will be critical to the overall success of efforts in achieving goals regarding statewide outreach to businesses and statewide partners.

## **Programs & Services**

The need to broaden DSA employment services to the business community and DSA job seekers is evident by the lack of soft skills and actual work experience required by hiring entities. In order to address the deficiency among job seekers, DSA counselors will become active in remedial learning activities to enhance the ability of DSA job seekers to find meaningful employment opportunities. The following initiatives will become a part of DSA services.

- Job Clubs
- Job Search Tools
- Interpersonal Skills
- Resume Development
- Cover Letter Construction
- Interviewing Skills
- Mock Interviewing
- Appearance
- Internship and Work Experience Opportunities

DSA plan to collaborate with the following partner entities:

- Oklahoma Manufacturing Alliance (OMA)
- Oklahoma Department of Commerce
- National Recruiting
- Regional Development Team
- Global Division
- Community Development Block Grant
- Oklahoma Works
- Rural Action Partnership Program Advisory Team
- Oklahoma Quality Jobs Program
- Oklahoma Career and Technology Schools
- Small Business Development Directors
- State Office of Career Tech
- Oklahoma Small Business Development Center
- U.S. and Oklahoma Small Business Administration
- USDA Rural Development
- Regional Councils of Government
- Local Chambers of Commerce
- Regional Economic Development Partnerships
- Local Economic Developers

- Oklahoma State Regents of Higher Education
- Governor's Economic Development Marketing Team
- Oklahoma Department of Corrections

(2) transition services, including pre-employment transition services, for students and youth with disabilities.

The DSA will work with businesses to identify opportunities for youth and students with disabilities to prepare for employment through activities, such as job shadowing, internships (paid and unpaid), paid work experiences, summer programs, guest speakers, mock interviews, and career fairs. The DSA Business Services Coordinator will work with the DSA Transition Coordinator to seek out opportunities with the businesses across the state.

The DSA will provide specific training on topics related to the transition of high school students with disabilities to life after high school, emphasizing the Workforce Innovation and Opportunity Act (WIOA) Pre-Employment Transition Services (PETS) Five Required Areas, education/training, employment, independent living, and self-advocacy. The DSA will also provide a variety of work experience programs across the state in which youth, starting at age 16, can gain specific work skills and receive training on independent living and self-advocacy. The DSA has established School Work Study contracts with over 250 schools, providing students the opportunity to work part time up to 15 hours per week in the school district or in the community. Other DSA programs that will provide youth the opportunity to gain work related knowledge and skills are: Work Adjustment Training, Project SEARCH, Tech Now, and STEM Camps.

## **h. Interagency Cooperation**

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

### **1. the State Medicaid plan under title XIX of the Social Security Act;**

The Oklahoma Health Care Authority (OHCA) serves as the Medicaid Agency for provisions of title XIX of the Social Security Act. The OHCA and Department of Human Services (DHS) maintain an MOA for provision of services. The DHS administers waiver programs which include extended services as a part of the waiver. Each Medicaid waiver individual plan includes outcomes which would create a pathway to achieve competitive integrated employment. DSA implemented a new customized employment contract which can be utilized by individuals to achieve employment. Increased education and in-service with contractors has occurred to encourage contracts with both the DSA and DDS to ensure a more streamlined access to competitive integrated employment opportunities. The DHS and

DSA utilizes an MOA to outline the provisions and responsibilities for extended services utilized in Medicaid funded programs

## **2. the State agency responsible for providing services for individuals with developmental disabilities; and**

### **Developmental Disabilities Services (DDS) of the Oklahoma Department of Human Services (DHS)**

DSA maintains a Memorandum of Agreement (MOA) with the DDS to improve employment outcomes for individuals with intellectual disabilities. DDS continues to provide extended services for individuals with intellectual disabilities in Supported Employment services.

Initiatives include:

Regular meetings with DSA programs managers, DSA programs field representatives and DDS staff. Monthly meetings address and solve problems identified by field staff of both agencies. Training to staff is based on challenges identified. DSA staff also provide individual case consultations at the request of the Community Rehabilitation Programs (CRP), DDS staff and/or DSA staff.

Provide regular written reports to DSA Executive Staff to keep them informed of current field issues discussed at the monthly meetings.

DSA Programs Field Representatives serve on the Developmental Disabilities Advisory Council. DSA Employment Support Services (ESS) staff and State level Transition Staff participate on the Employment First Alliance, which has a national goal of increased competitive integrated employment by 50% in the states. As a result of the Employment First Alliance, the Oklahoma operates under the Employment First Law.

DSA ESS staff and State level Transition Staff participate on the State Employment Leadership Network (SELN) -DSA ESS staff represents DSA on the Oklahoma Developmental Disabilities Council.

DDS Staff serves on the Oklahoma Transition Council (OTC) resulting in statewide conferences, resources, technical assistance, and additional professional development opportunities. Many issues and challenges are brought forth with a wide range of experts to assist the DSA and DDS in resolving and achieving their goals.

The DSA Statewide Transition Coordinator will work with DDS staff to ensure staff from each agency, schools, families, and CRPs understand the changes in WIOA regarding sub-minimum wage, are well-trained, and that Pre-Employment Transition Services (PETS) are provided to students with disabilities accessing vocational rehabilitation services through the DSA.

The DSA ESS staff will work with DDS staff to ensure CRPs and staff at each agency is provided ongoing training and consultation required by WIOA for any youth with a significant disability hired at subminimum wage. The partners will also ensure the required

reviews take place according to WIOA to ensure every opportunity for achieving full competitive integrated employment.

### **3. the State agency responsible for providing mental health services.**

The DSA maintains a Memorandum of Agreement (MOA) with the Oklahoma Department of Mental Health Substance Abuse and Services (ODMHSAS) to improve the employment outcomes of individuals with serious mental illness.

The DSA has a second MOA for the Partnership for Infant's, Children's, Youth's and Young Adult's Mental, Emotional and Behavioral Health. The partnership ensures the creation and efficient operation of a unified and integrated system of care for all of Oklahoma's infants, children, youth, and young adults with or at risk for mental, emotional, and behavioral disorders (MEB's). This includes an array of prevention, education, outreach, service and support for them and their families.

The commissioners and directors of the child-serving state agencies will serve personally on the partnership alongside the Directors of the Oklahoma Family Network (OFN), National Alliance on Mental Illness (NAMI) Oklahoma, family members, youth, and young adults. The partnership meets two or more times annually to receive reports and give approvals for actions and initiatives.

As a result of the second MOA, the DSA has two pilot projects with ODMHSAS and five community mental health centers to provide individualized career planning and employment to individuals between the ages of 16-25 with serious mental illness.

## **i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development**

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

### **1. Data System on Personnel and Personnel Development**

#### **A. Qualified Personnel Needs.**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

**i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;**

The DSA is committed to maintaining Comprehensive System of Personnel Development (CSPD) standards as set forth in section 101 of the Act. The DSA maintains a complete data system that facilitates the analysis of current and future personnel needs and resources. Data is continuously collected and updated allowing for retrieval of information to determine the DSA's profile of success in relation to the CSPD Plan. Staff are required to provide updated educational and professional certification/licensure information whenever there is a change. The accuracy of this information is verified during the CSPD annual review.

The DSA maintains a counselor to job seeker ratio of 1 counselor per an average of 95 job seekers; DVR average is 90 and SBVI average is 47. The DSA will continue to focus on appropriate caseload size by ensuring services are provided to eligible individuals with disabilities who actively participate in the vocational rehabilitation program leading to competitive employment.

**CURRENT POSITIONS FOR DSA:**

Division Administrators=2

Field Coordinators=3

Programs Manager = 20

Programs Field Representative = 12 VR

Specialist — Counselor = 106

VR Specialist — Vocational Evaluator  
= 4

Assistive Technology Specialist = 7

Rehab of the Blind Specialist = 15

Specialist on Deaf/Blindness = 1

i. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Listed is the current vacancies needing filled to adequately serve the DSA's job seekers. The numbers indicated are and continue to be based on historical and projected turnover rates.

Field Coordinator—Current Vacancies =2

Programs Manager — Current Vacancies = 2

Programs Field Representative — Current Vacancies = 1

VR Specialist —Counselor — Current Vacancies = 24



VR Specialist — Vocational Evaluator — Current Vacancies = 2

Assistive Technology Specialist — Current Vacancies = 2

Rehab of the Blind Specialist — Current Vacancies = 3

Specialist on Deaf/Blindness — Current Vacancies = 0

ii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Listed is the number of personnel projected vacancies over the next 5 years. The numbers indicated are and continue to be based on historical and projected turnover rates.

Programs Manager = 3

Programs Field Representative = 2

VR Specialist — Counselor = 20

VR Specialist — Vocational Evaluator = 2

Assistive Technology Specialist = 3

Rehab of the Blind Specialist = 4

Specialist on Deaf/Blindness = 1

**ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and**

**iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.**

## **B. Personnel Development**

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

**i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;**

There are two institutions of higher education in Oklahoma that prepare vocational rehabilitation professionals by awarding Masters of Science Degrees with Vocational Rehabilitation Counselor emphasis. These programs are Langston University and East Central University. Langston University is recognized by RSA as a historically black college/university (HBCU).

Both of these programs are Council on Rehabilitation Education (CORE) accredited. Graduating from a CORE accredited program automatically qualifies its graduates to test for the Certified Rehabilitation Counselor (CRC) certification so all the graduates have the credentials necessary for taking the CRC exam, thereby meeting the DSA's CSPD standard of a qualified rehabilitation professional.

**ii. the number of students enrolled at each of those institutions, broken down by type of program; and**

The number of students enrolled in the Masters of Science Degree program with Vocational Rehabilitation Counselor emphasis at Langston University = 124 and at East Central University = 67.

**iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.**

The number of students graduating from the Masters of Science Degree program with Vocational Rehabilitation Counselor emphasis from Langston University = 52 and from East Central University = 22.

## **2. Plan for Recruitment, Preparation and Retention of Qualified Personnel**

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

A variety of methods are used to address our current and projected needs for qualified rehabilitation personnel. Methods used include annual reviews of existing data, workforce planning using an established model, conducting outreach and networking, and the utilization of a Project Coordinator for Diversity Management position that focuses on

recruitment of individuals with disabilities and others of minority backgrounds. The goals and activities listed below indicate the actions to take place during this plan year.

#### GOAL

Using existing data and an established workforce planning model to identify current status and predict future needs of qualified rehabilitation personnel

#### ACTIVITY

- Identify current staff capacities and compare to future needs to identify gaps
- Initiate actions to fill the gaps through staff development, capacity building, and recruitment efforts

#### GOAL

Expand applicant pool for VR Counselor positions

#### ACTIVITY

- DSA has staff utilizing Agency's Educational Sponsorship Program.
- To alleviate difficulties experienced with applicants being determined for CSPD eligible when applying for a VR Specialist II or above position, the Job Family Description clarifies that graduates of a Council on Rehabilitation Education (CORE) accredited master's program are to be deemed eligible without further review.

#### GOAL

Retention of qualified rehabilitation professionals

#### ACTIVITY

- Provide for personal and professional growth by providing in-service development opportunities that enhance their knowledge, skills, and abilities
- Continue to offer a skill based pay adjustment for obtaining a professional certification or licensure appropriate with their position

### 3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

**A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and**

Although there is no longer a federal requirement, the DSA continues to follow the CSPD standard that was set in 1999 for all existing staff and qualified applicants for VR Counselor positions. At the request of the Oklahoma Commission for Rehabilitation Services, all applicants for the positions of counselor, field services coordinator, and programs manager are reviewed by the DSA expert on CSPD.

**B. the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.**

The DSA recognizes the importance of maintaining collegial relationships with professional organizations whose missions relate to empowering individuals with disabilities. The goal and activities listed below are the efforts to aid in this area.

GOAL

Expand relationships with professional organizations

ACTIVITY

- Support state, regional, and national professional organizations by:
  - Staff attendance at events
  - Encouraging staff to become members of their professional organizations
  - Assisting organizations to hold their events in Oklahoma

As a strategy to increase recruitment and retention of a diverse professional counselor staff from traditionally underrepresented and underserved populations, the DSA has assigned a Project Coordinator position for national diversity recruitment of CSPD qualified staff. The Project Coordinator participates in career days and does class presentations designed to extenuate the positive value of DSA employment to students enrolled in CORE-accredited masters of rehabilitation counseling programs. During such presentations, the Project Coordinator discusses the State of Oklahoma's low cost of living, the potential benefits contained in the State's employee compensation package and the State of Oklahoma's Carl Albert Public Internship Program (a paid internship training program).

The aforementioned activities are accomplished on a national basis, with a particular emphasis, at colleges and universities which serve, predominantly student populations from traditionally underserved and underrepresented populations. Moreover, these activities occur at colleges and universities, which include but are not limited to: Historically Black Colleges and Universities (HBCUs), such as, Langston University, Southern University (Baton Rouge, Louisiana), and South Carolina State University; Historically Spanish-Serving Colleges (HSCs), such as, University of Texas Rio Grande Valley (formerly, Pan American), University of Texas El Paso, California State University San Bernardino and the University of New Mexico-Highlands; and, Historically Native American Colleges, such as the Cheyenne and Arapaho Tribal College (Weatherford), the College of the Muscogee Nation (Okmulgee, Oklahoma), the Comanche Nation College (Lawton, Oklahoma), the Pawnee Nation College

(Pawnee, Oklahoma), Bacone (Muskogee, Oklahoma) and the University of Arizona (Tucson). Moreover, the assigned Project Coordinator and other DSA staff will engage in outreach activities with colleges and universities which have special emphasis on programs serving individuals who are blind or visually impaired, such as, Louisiana Tech University-Ruston, University of Arkansas-Little Rock, University of Illinois at Urbana-Champaign, and Mississippi State University's National Research and Training Center on Blindness & Low Vision. Also, the Project Coordinator will engage in outreach activities with colleges and universities that have rehabilitation counseling programs geared to serve individuals who are deaf or hard of hearing, such as, Western Oregon University and Winston-Salem University.

Finally, the Project Coordinator counsels with potential interns and institutional instructional staff about the requirements for obtaining paid internship and performs liaison activities with the universities such as coordinating letters of support from the DSA for their grant writing efforts.

The DSA point of contact impacts diversity issues within programs, such as, Section 121 Oklahoma Tribal Vocational Rehabilitation Programs, Consortia of Administrators for Native American Rehabilitation, Inc. (CANAR), state and local Chambers of Commerce, city councils, Hispanic Chambers, Legislative Black Caucus and community-based rehabilitation programs.

#### **4. Staff Development.**

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

##### **A. System of staff development**

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

Bi-annually a comprehensive needs assessment is performed to afford continuing educational and in-service opportunities for the DSA professional and paraprofessional staff. From this assessment a Staff Development Plan is formulated to address those needs. The goals and activities associated with staff development are detailed below.

##### **GOAL**

Provide opportunities for increasing individual knowledge, skills, and abilities

##### **ACTIVITY**

Over 220 activities have been provided to staff in areas of:

- AutismTransition
- Ethics
- Workforce Partnership
- WorkKeys
- AgrAbility — Ag4Life
- Professional Conferences
- Deaf/HOH
- Variety of Disability Specific Trainings
- Assistive Technology
- Leadership
- Diversity related conferences
- Counselor and Support Staff Academies
- Job Development
- Mental Health and the impact of Mental Illness on the rehabilitation process
- Core competencies training for managers, including Crucial Conversations, Crucial Accountabilities, and 7 Habits for Managers, Speed of Trust

## **B. Acquisition and dissemination of significant knowledge**

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

To round out a complete program of providing the most up to date information in the field of vocational rehabilitation, research and details of significance are disseminated to all professional and paraprofessional staff. Each year the Agency participates in the Fall and Spring National Council on Rehabilitation Education (NCRE) Conferences where new research is presented. Additionally, Institute on Rehabilitation Issues (IRI) documents are provided to all staff. Also as part of this program, materials are obtained and disseminated from a variety of seminars and conferences statewide, regionally, and nationally.

## **5. Personnel to Address Individual Communication Needs**

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

### **Services to the Deaf and Hard of Hearing Unit (DVR)**

Services for the Deaf and Hard of Hearing is a statewide program. It currently holds thirteen positions that address needs for persons with hearing loss. The Programs Manager supervises five counselor positions plus three rehabilitation technicians in offices located in both Oklahoma City and Tulsa. The counselors in these positions serve Oklahomans with hearing loss statewide. In addition, two other programs within the unit include the Interpreter Certification and Resource Center (ICRC) and the Interpreter Services Program. The ICRC is

the certifying body for interpreters in Oklahoma, as well as monitoring and maintaining a registry of Interpreters. This program also supports and promotes the interpreter profession by providing resources, training, and interpreter mentorship. The Interpreter Service Program maintains interpreter contracts and schedules American Sign Language interpreters and Communication Access Real-time Translation (CART), a real time captioning service, as needed for agency staff and for consumers.

### **Hispanic Community Outreach**

- Continue membership in local Hispanic Chambers of Commerce
- Continue participation with Hispanic Expos and other outreach activities around the state
- Use and ongoing review of current marketing materials — magnets and CDs in Spanish
- Continue support of Spanish translations of English forms and documents used by counselors and programs
- Continue to maintain Spanish Hotline
- Add Us In consortium — this DOL grant ended, however, the DSA will continue to develop best practices in employment targeting small businesses that are minority owned and people with disabilities from minority groups, Lesbian, Gay, Bisexual, Transgender (LGBT), women, and veterans. The DSA will continue this effort by referring job seekers to local workforce system partners.
- A Hispanic counselor is involved in developing a job club curriculum along with the Transition Coordinator for one of the high schools that serves predominantly Hispanic students.
- Hispanic Chamber of Commerce — new employment contract on Job Placement, Employment and Retention, and Supported Employment to serve Spanish speaking job seekers.
- SAVE Program — inter—governmental information service initiative which verifies the immigration status of benefit applicants. The SAVE Program has access to immigration status information from more than 100 million records contained in the Department of Homeland Security databases. By determining the immigration status of benefit applicants, SAVE helps authorized agencies ensure that only entitled applicants receive federal, state or local public benefits and licenses.

## **6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act**

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

DSA coordinates its CSPD activities with those provided under the Individuals with Disabilities Education Improvement Act. Through the DSA commitment with the Oklahoma Transition Institute (OTI), trainings for local educational agencies (LEA) and vocational rehabilitation counselors will assist with plans in coordinating CSPD activities. The Transition Coordinator also conducts annual training with all staff providing transition services, as well as quarterly calls about transition, distribution of transition newsletters, and in-person small group training regarding IDEA, IEPs, and other school documentation.

## **j. Statewide Assessment**

### **1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:**

In collaboration with the Oklahoma Rehabilitation Council (SRC), the DSA divisions of vocational rehabilitation and Services to the Blind and Visually Impaired will follow the Model Comprehensive Statewide Needs Assessment (CSNA) methodology developed by *InfoUse*, Berkeley CA to conduct the needs assessment.

The model CSNA addresses rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation services needs of: individuals with most significant disabilities, including their need for supported employment services; minorities; individuals with disabilities who have been unserved or underserved by VR; individuals with disabilities served through other components of the statewide workforce development system (other than the vocational rehabilitation program); youth with disabilities, and students with disabilities; and the need to establish, develop, or improve community rehabilitation programs within the state.

The model CSNA process includes six steps:

Year 1 - The DSA and SRC will complete steps one and two, and initiate step three.

Step 1: Defining and establishing CSNA goals. During this phase DSA staff will review available disability data and reports to establish the nature of the potential VR population within the state as well as identify other agencies and organizations that are resources for information collection.

Step 2: Developing CSNA plan for information and dissemination. During this phase DSA staff will develop a plan for collecting information, analyzing findings, disseminating results, and informing the state plan. The plan will include the identification of specific data, sources, and methods; data analysis; costs and timeline; and staffing or technical assistance needs.

Step 3: Gathering the information. During this phase DSA staff will initiate the collection of data from identified sources and provide a description of the information collection process.



Year 2 - The DSA and SRC will complete Step 3 continued as described above.

Year 3 - The DSA and SRC will complete steps four, five and six.

Step 4: Analyzing the results and developing findings. Once all the data is collected it will be analyzed and organized by information goal and topic.

Step 5: Developing the conclusions: Potential action strategies. During this phase conclusions from work will be developed and potential action strategies generated for each need expressed in findings.

Step 6: Informing state plan goals, priorities, and strategies. DSA staff will develop recommendations from the CSNA to inform the State Plan.

Status:

- The DSA is beginning at Year 1 of the next Statewide Needs Assessment. Planning of projects will begin in coordination with the SRC in the spring of 2020. Estimated completion date and distribution for the report will be September 30, 2022.
- The 2017-2019 Assessment was completed in September of 2019. Results are summarized by group in the following sections:

#### **A. with the most significant disabilities, including their need for supported employment services;**

Multiple research projects indicated that soft skills training and interview skills development are a significant need of those with the most significant disabilities. There is also a need for more Supported Employment, Employment and Retention, and job placement specialists in rural areas.

Transportation remains a significant need across the state. Specific transportation problems include:

- Lack of service in areas
- Expense,
- Inconsistency in services,
- Drivers not waiting the allotted time for client pickup.

#### **B. who are minorities;**

An estimated 24.0% of Oklahomans with disabilities belong to a minority racial group, including American Indian or Alaska Native (7.9%) and Black or African American (7.1%). DSA FFY 2017 demographics show that 10.0% of clients are American Indian while 17.7% of clients are Black or African American. Understanding the geographic distribution of our minority populations is also important. The majority of Black or African American Oklahomans reside in Oklahoma City or Tulsa (55.1%), as well as 47.1% of those who

identify as Hispanic or Latino. Only 11.9% of those who identify as American Indian or Alaska Native reside in Oklahoma City or Tulsa. There are an estimated 29,248 working age Native American or Alaska Natives with a disability living in Oklahoma, of which 47.0% reside in Congressional District 2 (comprised mostly of rural Eastern Oklahoma).

The DSA co-serves American Indian clients via partnerships with Tribal VR programs, and it is essential due to cultural aspects that the Tribal VR programs can provide. The DSA serves Hispanic clients in Oklahoma via our Hispanic unit. And staff continue to work through the Oklahoma Transition Institute to expand information for parents of Hispanic youth with disabilities.

### **C. who have been unserved or underserved by the VR program;**

The DSA in collaboration with the SRC held focus groups to obtain qualitative information. Based on the last assessment, research was focused on rural counties that were identified as being underserved. Despite active DSA programs to serve SSI/SSDI recipients, focus group attendees reported there is a family disconnect and fear regarding the loss of benefits. This fear results in the parents of youth with disabilities being resistant to services that are employment oriented.

Those in need of supported or customized employment in some rural areas of the state also face a lack of CRP vendors in remote areas, including southeastern Oklahoma. Needs were identified for more employer outreach to address accessibility issues with employer application methods, additional cooperation between schools and DSA counselors in the setting of appropriate career goals for youth with disabilities and making sure IPE and IEP goals are in-line prior to graduation.

In rural areas, there is a gap in service when serving the homeless populations and those that lack transportation. This is a result of missing auxiliary services that are available through other agencies and/or programs in Oklahoma City and Tulsa. In addition, transportation is a service gap that affects individuals with disabilities not just in rural areas, but across the state.

The 10 counties where the DSA was serving the lowest percentage of the target population for services were Cimarron, Jefferson, Beaver, Adair, Delaware, Ottawa, Love, Roger Mills, Texas, and Craig (2.74% to 9.44%). The counties are dispersed around the state but are predominately located in three areas, the northwest corner including the panhandle, the northeast corner, and south-central Oklahoma. The DSA was serving 22.03% of the target population for possible service statewide.

The ten counties with the highest percentage of the working age population with a disability were Marshall, Pushmataha, Sequoyah, Johnston, Haskell, Jefferson, Delaware, Pittsburg, Choctaw, and Craig (25.49% to 20.60%). These counties are located in eastern and south central Oklahoma. Three counties, Jefferson, Delaware, and Craig, are in the top ten for prevalence of disabilities among the working age population but are also in the ten counties where the DSA is reaching the lowest percentage of the target population. Overall, the ACS data indicates that individuals with disabilities living in Congressional District 2

are more likely to have poorer outcomes than individuals living in the other Oklahoma congressional districts, including the lowest disability employment rate, highest percentage living in poverty, and the highest percentage with less than a high school diploma.

#### **D. who have been served through other components of the statewide workforce development system; and**

The DSA compared our client data to data from Workforce and it was determined that for Program Year 2017, 4.8% of OKDRS clients were co-enrolled with the Title 1 and Title III programs through Workforce. 41.1% of DSA clients reported their counselor gave them information about Workforce Centers and only 29.3% reported they had gone to a Workforce Center for help getting a job. Feedback indicates that the W.I.O.A. partners need more open communication and training to improve client co-service, including disability etiquette training.

#### **E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.**

The DSA has worked closely with the SRC to focus research on the needs of youth with disabilities. Two public surveys were conducted that targeted DSA staff, partners, employers, and the parents of youth with disabilities and the other focused on parents only.

Needs were identified to remove administrative barriers faced by partner agency staff when providing services to youth with disabilities and expanding knowledge of DSA programs that focus on youth. Services with the highest perceived need were soft skills training, internship opportunities, and other types of vocational training and employment experiences. DSA staff respondents reported a moderate to high need for soft skills training, greater parental involvement/support, development of independent living skills and additional work-related experiences for transition aged youth. Only 33.3% of DSA and partner agency staff believe current opportunities for work-related experiences are adequate to meet the needs of students with disabilities.

The second survey focused on parents only and 17.57% of parents/guardians believed there were sufficient opportunities and indicated that there is a need to work closely with parents to lessen gaps in expectations and fears of employment and to increase parent understanding and participation in the transition planning process. Over half of respondent parents/guardians had concerns regarding how their child may be treated in a work environment. Only 65.54% of parents/guardians felt they were knowledgeable about transition planning. When asked, “What three services do you believe would most benefit your child,” the top three answers from parents/guardians were work-related experiences (45.00%), vocational training (35.71%), and independent living skills training (35.71%).

The research team sent a third and final survey aimed at service needs of transition aged youth to the parents or guardians of DSA clients under the age of 18. Report highlights included, 52.3% of parents or guardians have concerns regarding how their child may be treated in a work environment; 41.3% reported their child had experience filling out a job application and 44.6% having a paid job; only 21.7% reported their child had experience creating a resume. Via a means comparison, parents or guardians rated help paying for college or career tech as their child's highest need (4.26 mean), with help in finding a job that matches their interests and skills the second highest (4.20 mean), and help gaining job experiences as the third highest need (4.19 mean).

During the 2018-2019 school year, there were 37,389 students between the ages of 14 and 21 on an Individual Education Plan (IEP) in public school districts in Oklahoma. Statewide, The DSA was serving 1,751 or 4.68% of students on an IEP as clients. Statewide, in February of 2019, DSA had contracts with 58.7% of public high school districts in Oklahoma. The DSA transition team and counselors continue to reach out to school districts to encourage them to provide work-study services through a contract with the DSA.

Geographically, 68.42% of African American or Black students age 14 to 21 on an IEP attend school in Oklahoma or Tulsa counties, while 55.08% of Hispanic students age 14 to 21 on an IEP attend school in Oklahoma or Tulsa counties.

The DSA is providing services to students and youth, including Pre-ETS services to potentially eligible youth, in a number of ways, including, via contracts with the University of Oklahoma and Central Technology Center, through Counselor outreach and instruction, STEM Camps, Working on the Wichitas Summer Job Camp, Project Search, Summer Transition Employment Program, and through Community Rehabilitation Providers.

## **2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and**

The DSA conducted the Employment Support Services 360 analysis that surveyed the CRP providers, the DSA staff who work with CRP providers, and the DSA consumers that were served through CRPs. As a result of the analysis, DSA needs were identified for improvement in the areas of collaboration with CRP vendors to ensure vocational goals match the skill levels of clients to place job seekers in positions that match their vocation goal, additional vendor training regarding disability types and billing and/or paperwork and the need for CRPs to have more employer contacts and providers in rural areas. CRPs requested more training opportunities from the DSA, including benefits training regarding SSI/SSDI. Consumers who were served by the CRPs reported a need for ADA and sensitivity training for some CRP employees, but expressed an overall appreciation for the patience of the job coaches and reported that the services boosted the client's confidence in their ability to work. The majority of clients served by CRPs reported their job was a good fit (80.5%) and 77.8% reported they were happy with the job with a median wage reported of \$9.00.

As of March 04, 2019, DSA has contracts with 37 Community Rehabilitation Providers, 35 with supported employment contracts. From October 16, 2016 to June 17, 2019, DSA paid

authorizations for 1,163 supported employment clients for completion of milestone 1 (completion of an assessment), 759 payments for completion of milestone 3 (placement), and 586 for completion of milestone 7 (closure). In addition, 59 clients received some type of customized employment services.

Some rural regions of the state have either no CRPs or only limited availability to provide services to clients.

### **3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.**

The DSA with the SRC and input from the State Department of Education conducted a public needs assessment that focused on the needs of youth with disabilities. Services with the highest perceived need were soft skills training, internship opportunities and other types of vocational training and employment experiences. Needs for greater parental involvement/support, development of independent living skills and additional work-related experiences for transition aged youth were also identified. Only 33.3% of DSA and partner agency staff believe current opportunities for work-related experiences are adequate to meet the needs of students with disabilities.

The DSA is providing services to students and youth, including Pre-ETS services to potentially eligible youth, in a number of ways, including, via contracts with the University of Oklahoma and Central Technology Center, through Counselor outreach and instruction, STEM Camps, Working on the Wichitas Summer Job Camp, Project Search, Summer Transition Employment Program, and through Community Rehabilitation Providers. In addition, the Transition and AWARE teams have held five meetings around the state to assist counselors with new requirements under W.I.O.A., including the documenting of actual services, educational goals, and measurable skills gained. The meetings also sought to increase transparency and counselor knowledge of the new contract for pre-ETS services and increase outreach to schools that are not currently collaborating with the DSA to serve students with disabilities. Tribal partners were invited to attend the meetings.

Our Transition team works closely with the Oklahoma State Department of Education's Special Education staff to coordinate transition services under the Individuals with Disabilities Education Act. The 11 counties where the DSA was serving the lowest percentage of students on an IEP were Alfalfa, Beaver, Greer, Harmon, Johnston, Kiowa, Love, Adair, Jackson, Ottawa, and Leflore (0.0% to 1.3%). Local school board level barriers sometimes inhibit the ability of the DSA to provide coordinated transition services.

In partnership with 12 other Oklahoma agencies and organizations (public, private, and non-profit) and two local public school districts (Lawton and Chickasha) are working together on a pilot project called Oklahoma Works for All (OWFA). OWFA is a cross-sector, person-centered pilot initiative with two components. The first is working with youth ages 14-21 with intellectual disabilities on training, work experience and customized employment

opportunities. The youth must be OKDRS clients or apply for services and must also be on the OKDHS Developmental Disability Services (DDS) waiting list (or must apply or be waiver-eligible for the list). The second component is working with the families and caregivers of our youngest kids (age 3 and up) in the public schools to ensure kids with an intellectual disability are well-supported to achieve their vision for a good life through the use of the LifeCourse materials. The goal is to improve employment and financial outcomes for Oklahomans with an intellectual disability.

## **k. Annual Estimates. Describe:**

### **1. The number of individuals in the State who are eligible for services;**

In 2017, the American Community Survey, U.S. Census Bureau, estimated 326,949 Oklahomans age 18-64 had disabilities which is 14.2 % of working age population who may be eligible for VR services.

### **2. The number of eligible individuals who will receive services under:**

#### **A. The VR Program;**

The number of eligible individuals estimated who will receive services in the VR Program for FFY 2020 equals 9,857. The number of eligible individuals is the same for FFY 2021.

#### **B. The Supported Employment Program; and**

The number of eligible individuals estimated who will receive services in the Supported Employment Program for FFY 2020 equals 144. The number of estimated eligible individuals is the same for FFY 2021

#### **C. each priority category, if under an order of selection;**

**A.** The estimates per year are for FFY 2020 and FFY 2021.

Title I, Part B, Priority Group 1 = 4,222

Title I, Part B, Priority Group 2 = 4,923

Title I, Part B, Priority Group 3 = 640

Title VI, Part B = 72

### **3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and**

The estimates per year are for FFY 2020 and FFY 2021.

Title I, Part B, Priority Group 1 = 245

Title I, Part B, Priority Group 2 = 311

1 Title I, Part B, Priority Group 3 = 25

**4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.**

The estimates per year are for FFY 2020 and FFY 2021.

Title I, Part B, Priority Group 1 — Estimated Funds = 10,890.738 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 2 — Estimated Funds = 12,486.05 (Average Cost of Services = 2,536)

Title I, Part B, Priority Group 3 — Estimated Funds = 1,623,415 (Average Cost of Services = 2,536)

Title VI, Part B — Estimated Funds = 300,000 (Average Cost of Services = 4,166)

## **I. State Goals and Priorities**

The designated State unit must:

### **1. Identify if the goals and priorities were jointly developed**

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

- The goals and priorities have been jointly developed with the Oklahoma Rehabilitation Council (SRC). DSA participates in regular SRC meetings and has designated staff who participates on the following SRC committees:
- Executive Committee- Outreach to businesses and disability organizations to educate on DSA programs, services and activities
- Program and Planning Committee: Data and Findings of customer satisfaction surveys and state performance accountability measures/assessment
- Policy and Legislative Committee: Public hearings, client success stories

- Transition committee: Participation on the Oklahoma Transition Institute: collaboration on the statewide needs assessment on assessments of individuals with disabilities for transition career services and pre-employment transition services, including services under IDEA.

The SRC also collaborates in drafting and revision of agency policy development, and meets regularly with the DSA Administration.

## **2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.**

The DSA divisions of Vocational Rehabilitation (DVR) and Services to the Blind and Visually Impaired (SBVI) have identified the goals and priorities in carrying out the VR and Supported Employment programs.

**Goal 1:** Deliver quality opportunities for employment, independent living and economic self-sufficiency to Oklahomans with disabilities

**Goal 2:** Produce results that are accountable to the public and our customers.

**Goal 3:** Strengthen Our Workforce

**Goal 4:** Strengthen Our Infrastructure

## **3. Ensure that the goals and priorities are based on an analysis of the following areas:**

In a joint effort with the SRC, the DSA DVR/SBVI divisions formed work groups to develop measures and action steps to address the DSA organizational strategic plan goals and priorities.

### **A. The most recent comprehensive statewide assessment, including any updates;**

The goals and priorities were developed while reflecting upon the comprehensive statewide assessment latest findings.

### **B. the State's performance under the performance accountability measures of section 116 of WIOA; and**

The goals and priorities were developed while reflecting upon the VR performance accountabilities.



**C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and finding and recommendations from monitoring activities conducted under section 107.**

The goals and priorities were developed while reflecting upon meeting information from discussions with the SRC.

**m. Order of Selection. Describe:**

**1. Whether the designated State unit will implement and order of selection. If so, describe:**

**A. The order to be followed in selecting eligible individuals to be provided VR services.**

**The DSA operates under an Order of Selection. Policy reflects the need for order of selection, priority group definitions, implementation, closing and opening of priority groups, continuity of services, and information and referral services.**

**Order of selection**

(a) **Need for order of selection.** The Department, in consultation with the Oklahoma Rehabilitation Council, has determined, due to budgetary constraints or other reasoned limitations that it cannot serve all individuals who are determined eligible for DVR and SBVI services. The Department consults with the Oklahoma Rehabilitation Council regarding the:

- (1) need to establish an order of selection, including any re-evaluation of the need;
- (2) priority categories of the particular order of selection;
- (3) criteria for determining individuals with the most significant disabilities; and
- (4) administration of the order of selection.

(b) **Priority groups.** It is the policy of the DSA to provide vocational rehabilitation services to eligible individuals under an order of selection. Under the order of selection, the Department has established three priority groups on the basis of serving first those with the most significant disabilities. Every individual determined to be eligible for DVR and SBVI services is placed in the appropriate priority group based upon the documentation used to determine eligibility and/or vocational rehabilitation needs. Selection and placement in a priority group is based solely upon the significance of the eligible individual's disability, and is not based upon the type of disability, geographical area in which the individual lives, projected type of vocational outcome, age, sex, race, color, creed, religion, or national origin of the individual.

The priority groups are:

(1) **Priority Group 1.** Eligible individuals with the most significant barrier to employment. A most significant barrier is one that includes a mental or physical disability resulting in serious limitations in three or more functional capacities and can be expected to require multiple services over an extended period of time.

(2) **Priority Group 2.** Eligible individuals with significant barriers resulting in serious limitations in at least one, but not more than, two functional capacities and can be expected to require multiple services over an extended period of time.

(3) **Priority Group 3.** Eligible individuals with disabilities not meeting the definition of individual with a significant barrier.

(c) **Implementation.** Prior to the start of each fiscal quarter, or when circumstances require, the DSA Director will determine in which priority groups new Individualized Plans for Employment will be written and initiated. The Director may restrict the writing and initiation of new Individualized Plans for Employment within a priority group to cases having eligibility dates falling on or before a specified date providing that all consumers in higher priority groups are being served. Considerations in making this determination will include, but not be limited to, the projected outcomes, service goals, expenditures, and resources available for each priority group. Projected costs and resources for each priority group will be based upon costs of current Individualized Plans for Employment, anticipated referrals, availability of financial resources, and adequacy of staffing levels. The Director will implement actions under the order of selection through written notice to DVR and SBVI staff. The written notice will specify the implementation date of the action and direct DVR and SBVI staff on how to handle cases by priority group and application date. DVR and SBVI staff will inform each eligible individual on their caseloads:

(1) of the priority groups in the order of selection; of the individual's assignment to a priority group; and

(3) of the individual's right to appeal that assignment.

(d) **Closing and opening priority groups.** When all or part of a priority group is closed, designated cases within that priority group without a written IPE will be placed on a waiting list after the individual has been determined to be eligible. No IPE will be written for cases on the waiting list. Staff will continue to take applications, diagnose and evaluate all applicants to determine eligibility and vocational rehabilitation needs, find the individual eligible when documentation supports such a decision, then place each eligible individual's case in the appropriate priority group. If an eligible individual is placed in a closed priority group, his or her case will go on the waiting list and no IPE will be written or initiated. The DSA Director will notify DVR and SBVI staff in writing when all or part of a closed priority group is opened. When this directive includes new applicants who are found eligible, individuals already on the waiting list within that same priority group will be given priority over new applicants. When all or part of closed priority groups are opened, staff will contact individuals on the waiting list to develop and implement their Individualized Plans for Employment using the priorities in Paragraphs (1) - (3) of this Subsection:

- (1) contact individuals within the highest open priority group first, Most Significant being the highest of all priority groups;
- (2) within each opened priority group, staff will contact individuals on the waiting list in order of application date, earliest application date first; then
- (3) staff will contact individuals whose cases will remain on the waiting list to explain how their cases will be handled.

(e) **Continuity of services.** Any individual with an IPE that existed prior to the date all or part of that individual's priority group was closed will continue to receive services as planned. Such an IPE may be amended if the changes are necessary for the individual to continue progress toward achieving an appropriate employment outcome, or are otherwise necessary within policy. Persons requiring post-employment services will also be provided the necessary services regardless of priority group assignment.

(f) **Information and referral services.** Information and referral services will remain available to eligible individuals who are not in an open priority group. These individuals will be given information and guidance, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and will be appropriately referred to Federal and State programs (other than the vocational rehabilitation program) including other components of the statewide workforce investment system in the state. No IPE will be written to provide such services to these individuals.

## **B. The justification for the order.**

There are two reasons regarding the justification for the order; budgetary constraints and/or lack of the capacity of staff to serve eligible individuals.

## **C. The service and outcome goals.**

The service and outcome goals for FFY 2020 are:

### For Priority Group 1:

Number of individuals to be served = 3,728

### For Priority Group 2:

Number of individuals to be served = 4,012

### For Priority Group 3:

Number of individuals to be served = 663

THE TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER.

The time for which these goals may be achieved each year for FFY 2020 are:

For Priority Group 1:

Average days between plan signature and closure = 963

For Priority Group 2:

Average days between plan signature and closure = 791

For Priority Group 3:

Average days between plan signature and closure = 912

**D. The time within which these goals may be achieved for individuals in each priority category within the order.**

The DSA serves eligible individuals with the most significant disabilities and barriers to employment first. When all priority groups are open and it is determined there is a need to implement Order of Selection, the first group to close is priority group 3, then priority group 2, and last priority group 1. If all three groups are closed, the first one to open is priority group 1, then priority group 2, and last priority group 3.

The waiting list is reviewed monthly by program, fiscal and administrative staff to determine the current level of existing resource capacity. The goal is to be able to clear priority group 1 monthly and if possible to reduce the waiting list for priority groups 2 & 3. Releases from the waiting list are based on priority group ranking and applications with the earliest date are removed first.

**E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and**

**2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.**

The DSA offers job retention, post-employment services, and information and referral services to eligible individuals who require specific services and/or equipment to maintain employment. Any individual with an IPE that existed prior to the date all or part of that individual's priority group was closed will continue to receive services as planned. Such an IPE may be amended if the changes are necessary for the individual to continue progress

toward achieving an appropriate employment outcome, or are otherwise necessary within policy. Persons requiring post-employment services will also be provided the necessary services regardless of priority group assignment. Information and referral services will remain available to eligible individuals who are not in an open priority group. These individuals will be given information and guidance, using appropriate modes of communication, to assist such individuals in preparing for, securing, retaining or regaining employment, and will be appropriately referred to Federal and State programs (other than the vocational rehabilitation program) including other components of the statewide workforce development system in the state. No IPE will be written to provide such services to these individuals.

## **n. Goals and Plans for Distribution of title VI Funds.**

### **1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.**

DSA will continue to provide opportunities for Oklahomans with the most significant barriers to employment to enter competitive integrated employment through the use of funds received under Title VI, part B supplemented by Title I, part B to purchase time—limited Supported Employment services. DSA purchases services from qualified CRPs through contracts based on established rates for services. The Title VI goal and priority funds received are for FFY 2020.

Under state contracting laws, new contracts are established when requested by a CRP that meets minimum qualifications. DSA has contracts with private non—profit, for—profit, and government CRPs of Supported Employment and other employment programs for individuals with significant barriers to employment. Contracts are paid on an outcome basis. The contracts emphasize quality service at both the individual and contract levels.

Through payments at the completion of each milestone, multiple opportunities are created for the individual and the DSA counselor to assure that a quality service has been delivered and that competitive integrated employment has been achieved. Contracts also emphasize controlling average cost of service per individual, while providing payment incentives for difficult to serve individuals in these categories: individuals with felony conviction, high school students classified as severely emotionally disturbed, individuals with HIV/AIDS, or individuals who are legally blind, deaf or deaf—blind. A wage incentive is provided 90 days after case closure to CRP's who assist individuals with obtaining employment with hourly wages at or above the Oklahoma average wage determined annually by the Oklahoma Employment Securities Commission (OESC)

There are no restrictions on the types of disabilities served through the contracts, although the majority of individuals served continue to be those with intellectual disabilities or serious mental illness as a primary diagnosis. Although most CRPs serve a diverse population of individuals with the most significant barriers to employment, mental health CRPs continue to serve exclusively individuals with serious mental illness.

Mental Health CRPs have the option of providing Supported Employment. DSA and the Department of Mental Health and Substance Abuse Services continue to collaboratively pursue strategies for improving services and enhancing service capacity for individuals with serious mental illness. One of the strategies is a pilot project in partnership between the DSA and the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS). This contract is intended to provide Individual Placement and Support (IPS) services to individuals with serious mental illness or co-occurring mental illness and substance abuse disorders who have not achieved competitive integrated employment or for whom competitive integrated employment has been disrupted or intermittent. IPS services can be provided to out of school or at risk youth aged 16 or older, high school seniors in their final semester, and adults aged eighteen (18) or older. Contractors eligible to provide services under this contract have been identified as ODMHSAS contracted providers located in Cleveland County and Oklahoma County only.

In our continued effort to provide outreach to increase the number of Rural Employment CRPs, DSA distributes informational marketing material regarding the contract process statewide in hopes to increase services and meet the employment needs of individuals with disabilities in the rural areas of the state. Collaborative efforts and partnerships with DDS and ODMHSAS assist in this effort to increase providers across the state.

In an effort to increase services, DSA has initiated a customized employment program. The DSA is providing expansion plan to fund the additional services required under the Work Innovation and Opportunity Act (WIOA).

## **2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:**

### **A. the provision of extended services for a period not to exceed 4 years; and**

The DSA is developing an extended services contract with ODMHSAS and Developmental Disability Services (DDS) of the Oklahoma Department of Human Services for youth with the most significant disabilities. This model allows for 24 months of intensive on-site supports and training prior to the initiation of up to 48 months of extended services if needed.

### **B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

#### **Customized Employment Services Project**

Memorandum of Understanding: The DSA entered into a contracted agreement with qualified CRPs, known as the Contractor.

Scope of Work: This is a project to provide Customized Employment Services and/or other employment services to individuals in Priority Group 1 with the most significant disabilities.

Some of the other employment services are available to individuals in Priority Group 2 with significant disabilities. This contract is intended to meet the requirements of WIOA. Career Exploration and Internship services are optional and can be used with individuals in Priority Group 1 or 2, receiving CE, SE or ER contract services. Onsite Supports and Training and Extended Services for Transition (EST) can be used with individuals in Priority Group 1 only, receiving CE or SE contract services. The DSA Counselor, working with the individual and the Contractor, will designate the services to be used. The Discovery and Profile and Career Exploration services only, can be used with transition aged youth, age 16 or above, on a Trial Work Plan or Individualized Plan of Employment, to gather assessment information related to employment, and to help identify additional employment related transition services and/or a career path.

This contract is designed to be flexible to meet the needs of the individual through ongoing communication and team meetings. Individuals may not need all services and/or extended training time. Although some services are required, others are designed to provide individuals with the flexibility to bypass optional services and/or progress through required services in less time when they meet the required outcome. Team meetings will also be utilized to determine an individual's readiness to move between services. The team includes: the individual, DSA Counselor, Contractor, and any other relevant team member.

**DSA Responsibilities:** The DSA agrees to provide payment for satisfactory performance of services outlined.

**Partner Responsibilities:** The Contractor will: 1. The Contractor has completed discovery activities that utilize a person centered approach to describe "who the individual is". and guides the planning process to develop a customized job. The Contractor will summarize the Discovery findings on the individual's profile. The Contractor has provided benefits planning information to any individual who is receiving Social Security Administration (SSA) benefits, and has referred the individual to a DSA Benefits Planning Specialist if the individual, payee, or family member has requested the service.

2. The Contractor will provide opportunities for the individual to explore potential occupations, job conditions, interests and job tasks in order to enhance their vocational goal and prepare the individual for a successful job match. Exploration activities could include but are not limited to: job shadowing, work-site tour, job sampling, trial work experiences, volunteer experiences and situational assessments.

3. The Contractor will schedule and conduct a Team Meeting with the individual, DRS Counselor and all other relevant team members to create a CE Employer Development Plan.

4. The Contractor has created the Visual Résumé with the individual. This résumé was used in the job development process to highlight the individual's potential contributions and the types of tasks the individual is interested and capable of performing. The Contractor has explained Customized Employment and outlined what the employer can expect from the individual and the Contractor during the job development process. The Contractor has developed a successful job match that meets the individual's contributions, conditions and interests and the employer's unmet needs. A job can be developed within an individual's

family's business as long as the job meets the definition of competitive integrated employment.

5. The individual has worked successfully for a minimum of eight (8) weeks beginning with the first (1st) day of employment and has received all appropriate onsite supports and training. At the completion of this service, individuals can be moved to CE Maintenance if they meet the following criteria: individual is working at least sixty percent (60%) of their weekly work goal as identified on their IPE, and on-site support needs cannot be more than twenty-five percent (25%) of their total work hours per month.

6. The individual has successfully worked four of (4) or maximum of eight (8) additional weeks beyond the CE Job Coaching I and has received all appropriate onsite supports and training. The Contractor can move the individual to CE Maintenance after the maintenance criteria is met. To move to CE Maintenance, the individual must be working at sixty percent (60%) of their weekly work goal as identified on their IPE, and their on-site support needs cannot be more than twenty-five percent (25%) of their total work hours per month. If the maintenance criteria is not met at the end of six (6) weeks, then a team meeting is required to determine if the individual needs to be moved to Onsite Supports and Training at the completion of CE Job Coaching II.

7. The individual has worked successfully for at least four (4) weeks and has received all appropriate onsite supports and training. Onsite Supports and Training can be authorized and provided a total of four (4) times in four (4) month increments.

8. The individual can be moved to CE Maintenance at the end of any four (4) week increment if they meet the maintenance criteria. The maintenance criteria specifies the individual must be working at sixty (60%) of their weekly work goal as identified on their IPE, and on-site support needs cannot be more than twenty-five (25%) of their total work hours per month.

9. If the individual remains in this service at the end of the initial three and a half (3½) months and has not been moved to CE Maintenance, a team meeting is required. Additional Onsite Supports and Training can be authorized and provided if the team determines it is needed to assist the individual with meeting the maintenance criteria.

10. The individual has worked successfully for at least four (4) weeks, and received all appropriate onsite supports and training. To achieve maintenance, the individual must work at least one entire work week without EC support, must work at their weekly work goal as identified on their IPE for the four (4) weeks of maintenance, their onsite/offsite support and training needs must be less than or equal to twenty percent (20%) of their total work hours per month, the employer is satisfied with the individual's job performance, and the individual is satisfied with their job. At the completion of CE Maintenance, if the individual has met all of the requirements, they can be moved to the CE Employment Outcome Service.

11. The individual has worked successfully for up to a total of forty-eight (48) months beyond Maintenance or until turning age twenty-five (25), whichever occurs first. The



individual has received all appropriate onsite supports and training during extended services for transition.

12. The individual has been employed in a permanent job and has worked a minimum of ninety (90) calendar days beyond completion of maintenance. The Contractor has provided all appropriate training and support services, and extended services are in place. The employer is satisfied with the individual's job performance, and the individual is satisfied with the job. Only weeks where the hours worked meet the weekly work goal, as identified in the IPE, are counted toward the required ninety (90) days.

**Funding/Costs:** The DSA agrees to pay the Contractor, upon satisfactory performance of services outlined in agreement, up to \$27,000.00

**Special Incentives -** Based on availability of DSA funds, one special incentive payment may be earned per case if the following conditions are met and proper documentation is provided as described:

The Contractor may receive an incentive of five hundred dollars (\$500) per individual for a one-time payment at closure, due upon successful closure by DSA Counselor, for difficult-to-serve individuals in these categories: individuals who have felony convictions, high school students who are classified by the school as severely emotionally disturbed (SED), individuals with HIV/AIDS, individuals who are legally blind, deaf with primary communication of sign language, or deaf/blind.

A wage incentive is provided 90 days after case closure to CRPs who assist individuals with obtaining employment with hourly wages at or above the Oklahoma average wage determined annually by the Oklahoma Employment Securities Commission.

**Referral Process:** At the time of referral, the DSA Counselor will provide the Contractor with a copy of the Eligibility Determination Form, Individualized Plan of Employment (IPE) or Trial Work Plan, and Personal Information Form. Once the intake is scheduled, the Contractor will send a CE Authorization Request Form to the DSA Counselor, Rehabilitation Technician and Program Manager. The DSA Counselor authorizes for the first two services to be used (i.e. CE Discovery and Profile and Career Exploration, etc.) within five (5) business days.

The Contractor should contact the DSA Counselor and ask for the authorization to be sent if not received within five (5) business days. The Contractor will only provide services that have been pre-authorized by the DSA Counselor. The only services that can be provided under a trial work plan include the CE Discovery and Profile service and the Career Exploration service.

## **o. State's Strategies**

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and

(18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

## **1. The methods to be used to expand and improve services to individuals with disabilities.**

The DSA Program areas that are utilized to expand and improve services include:

### **Veterans Initiative**

DSA Personnel consisting of Administrators from DVR and SBVI are involved in Quarterly Local Community Collaborative meetings chaired by the Community Employment Coordinator of the US Department of Veterans Affairs. The purpose of this group is to expand vocational opportunities to homeless veterans, of which many have disabilities. This group will be may be expanded to the Eastern part of the state. This collaboration allows the DSA to develop partnerships who have a vested interest in providing work opportunities to disabled veterans and other Oklahomans with disabilities. This initiative has resulted in a DSA pilot project with Langston University and the Veterans Administration to expand educational opportunities for Veterans.

### **Social Security Administration Certified Benefits Planners**

DSA has three certified Social Security Administration (SSA) Work Incentive Counselors working and co-located within Workforce Centers and another three rotating between the remainder of the Workforce Centers and DSA offices. Workforce Center staff and DSA Benefits Planners collaborate to assist job seekers receiving SSA benefits. DSA Benefits Planners explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark. Job seekers are provided general information concerning the impact of work on SSA disability benefits. Upon applying for VR services, these individuals would then also receive detailed reports illustrating the impact of work on other benefits and services the individual may be receiving, such as TANF, SNAP, UI compensation, Veteran's benefits, etc. DSA Benefits Planners address concerns of individuals with disabilities about the possibility of losing benefits and help them understand and maximize their work incentives.

### **Ticket to Work Program**

Coordinated activities under Ticket to Work are delivered by a statewide Ticket to Work Coordinator. The coordinator will organize activities within the DSA and with partnership employment networks (EN's) to ensure the needs of ticket holders are met at a maximum level. Ongoing outreach efforts will be conducted to recruit new partnership employment networks in order to provide more opportunities to assist ticket holders in reaching Substantial Gainful Activity (SGA) level employment outcomes. The coordinator will continue to oversee the ticket to work hotline and will provide ticket holders with information and referral for state VR, partnership EN's, and external EN's.

### **Limitations on use of Subminimum wage**

DSA conducts annual outreach and review services for individuals earning subminimum wage under a 14c certificate. Individuals will receive information about career counseling and information and referral services, as well as other components to the Vocational Rehabilitation program. The intent is to inform all individuals of the VR process in relation to seeking and obtaining competitive integrated employment. All individuals newly hired have to receive the career counseling and information and referral services two times the first year of employment and annually afterwards. In 2018-2019 the DSA reached approximately 2,553 individuals through this outreach effort. The DSA also worked with the Department of Labor to provide information and training services to employers who hold the 14c certificate. All newly hired individuals have to receive the career counseling and information and referral services two times the first year of employment and annually afterwards. The DSA provides documentation in collaboration with the local school district of specific services to youth 24 and younger, if those individuals are known by the DSA to be seeking subminimum wage work.

### **Workforce Advisory Committee**

The Governor of the State of Oklahoma has established a Workforce Advisory Committee to put forth recommendations and a strategic framework of moving Oklahoma's workforce to a top 10 status. The Committee is comprised of decision-makers, subject matter experts and stakeholders throughout the state. The Committee's primary work is leveraging the state's existing workforce and employment-related agencies to develop an efficient and effective model. The results are recommendations aligned with the needs of business and industry.

The DSA executive director is a member of the Workforce Advisory Committee. The DSA is leading the efforts regarding a policy recommendation to increase education/training participation rates of underserved and disengaged populations by supporting and leveraging programming targeting minorities, at-risk populations and the formerly incarcerated.

### **Other DSA program areas that are utilized to expand and improve services include:**

- Services to the Blind and Visually Impaired Center in Tulsa and Oklahoma City
- SBVI Technology Lab and Training Lab in Tulsa and Oklahoma City
- Visually Impaired and Blindness Empowerment (VIBE)
- DVR Technology Lab and Training Lab in Oklahoma City
- Oklahoma School for the Blind (OSB) transition work adjustment program
- Partnering with OSB for Vocational Evaluations
- Project Search
- Business Services Program
- Business Enterprise Program
- Office of Juvenile Affairs collaborations
- Department of Veterans Affairs collaborations
- On-line applications
- Customized Employment
- JOBS Contract
- Wellness Recovery Action Plan Training (WRAP)

- Summer Transition Employment Program (STEP)

## **2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.**

The DSA delivers assistive technology statewide for job seekers in their journey to employment. Assistive technology specialists complete a variety of different assistive technology assessments and evaluations for job seekers, business work sites, and workforce system partners. The types of evaluations are home modifications, vehicle modifications, personal mobility needs, computer access, worksite modifications, activities of daily living, communication school accommodations, and accessibility reviews. Assistive technology specialists focus on the reported obstacle, rather than the disability diagnosis. A big part of an assistive technology evaluation is to identify what the real problem or obstacle is for the individual job seeker or business work site.

## **3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.**

### **Services to the Deaf and Hard of Hearing Unit (DVR)**

The staff of DVR Services for the Deaf and Hard of Hearing (SDHH) Unit are committed to providing communication access and employment opportunities for those with hearing loss. All staff has a competency of American Sign Language fluency, ranging from novice to expert and SDHH also employs a trilingual staff member allowing provision of services to Spanish speaking individuals with hearing loss. SDHH provides services to adults and transition aged youth with hearing loss across the state and works closely with the Oklahoma School for the Deaf, which provides office space for a counselor on campus who provides transition services to Deaf and hard of hearing youth at the school.

SDHH has been working with DVR field offices across the state providing resource kits which include assistive listening devices and interpretive equipment to assist in communicating with individuals with hearing loss. SDHH also provides consultation regarding assistive technology devices, medical hearing devices such as hearing aids and cochlear implants, and cultural mediation for Deaf job seekers with agency staff, employers, and organizations.

Each staff member is equipped with a videophone provided on their agency computers, which allow for direct contact and telecommunication between SDHH staff and those who are deaf and use sign language.

### **Hispanic Community Outreach**

For consumers that speak a language other than English, this unit has access to translation/interpreter services for other native languages.

- Spanish translated Transition brochures and checklists to be disseminated to high school students and parents about Vocational Rehabilitation Services.
- Two Bilingual counselors serve job seekers statewide in outreach efforts
- Videophones will be utilized for outreach to the Hispanic population statewide, reaching within the rural communities.
- An emphasis on all divisional brochures to be translated into Spanish to provide information to Hispanic individuals.
- Assists the SRC with translation of brochures and documents into Spanish.
- Hispanic Chamber of Commerce — employment contract on Job Placement, Employment and Retention, and Supported Employment to serve Spanish speaking job seekers.
- Spanish speaking Interpreter is available statewide for counselors in the metro and rural areas who can translate forms, applications, plans, etc. The Interpreter travels to outlying offices to interpret for meetings between consumers and Spanish speaking families of consumers. When forms in Spanish are understood, completed and signed by the consumer, they are translated into English to capture information in the AWARE case management system.

### **American Indian Vocational Rehabilitation Programs (AIVR)**

The DSA Tribal Liaison works with the DSA and Oklahoma Tribal Vocational Rehabilitation (OKTVR) programs. The liaison's role will be to assure that appropriate referrals are made between the DSA and OKTVR programs. The liaison assists with collaboration between programs to assure that eligibility decisions and individualized plans of employment are developed with collaboration between both programs.

The DSA currently has MOUs in place with OKTVR Tribal programs to ensure that vocational rehabilitation services are being provided on a consistent basis with effective collaboration between both programs.

The DSA has VR specialists assigned to each high school in Oklahoma. If the OKTVR program has transition services in their grant, DSA staff refers job seekers to their program, and they refer job seekers to the DSA. DSA staff will visit schools together, introduce OKTVR staff to school personnel, conduct joint trainings, and attend local transition team meetings. Co- shared services may apply, however, if the OKTVR does not have transition services in their grant, DSA staff share their programs contact information with the youth and family, connect with OKTVR staff, share their application when they reach the age of 18, and conduct joint community trainings together.

DSA and OKTVR personnel currently participate in monthly meetings chaired by the OKTVR Directors. The DSA and OKTVR programs both participate in the annual Consortia of Administrators for Native American Rehabilitation (CANAR) meetings, and have open lines of communication between the DSA Director, Division Administrators, Field Service Coordinators and Program Managers of the DSA, as well as OKTVR Tribal Directors.

### **Road to Independence (RTI)**

The Oklahoma Department of Human Services (DHS) received a federal grant from the Administration for Children and Families, Family and Youth Services Bureau, to plan for how to build on the capacity of state and local systems to prevent long-term homelessness among at-risk youth with foster care involvement; the DSA is a critical partner in this initiative with DHS. The focus is on youth 14-21 years of age in housing, education, employment, well-being, and permanent connections.

In Oklahoma County, there are 3 primary needs/issues, 1) inadequate independent living and transition services, 2) placement instability of youth while in child welfare custody; and 2) lack of housing options for youth and young adults after exiting Child Welfare custody. The effort coordinates support to the local Oklahoma County DHS Child Welfare Office 55A to improve transition services, placement stability, and permanency for youth 14-18 years of age in child welfare custody.

Partners include DHS, Oklahoma Independent Living programs, DSA, and NorthCare. The DSA has a designated rehabilitation technician that DHS workers can contact when a youth is placed to locate the VR counselor to contact and make a referral, when appropriate. Plans to expand in the Tulsa area are pending.

### **Strategies for Recruitment Efforts of Professional Counselors from Minorities, Underrepresented and Underserved Populations**

The DSA's goal is to continue to foster and maintain our long-standing relationships with East Central University (Ada, Oklahoma) and Langston University (the State of Oklahoma's only historically black university). DSA staff members are committed to working with these institutions of higher education, which are the only CORE-accredited rehabilitation counselor programs in the State of Oklahoma. This commitment is shown by their willingness to work as adjunct professors or guest lecturers. The DSA Director's strategy is to assign the Project Coordinator for National Diversity Recruitment, as a liaison to Langston University, which produces counselors on its Oklahoma City and Tulsa campuses; in order to, help facilitate activities between the DSA and Langston related to the development and recruitment of qualified professional counselor staff members for the DSA. The DSA will consider additional outreach to State University's as needed to enhance recruitment efforts of university students who are considering work as a licensed professional counselor (LPC) or certified rehabilitation counselors.

Additionally, the Project Coordinator is assigned the responsibility to act as the DVR/SBVI designee or point-of-contact with groups like Oklahoma AIVR Programs, the Consortia of Administrators for Native American Rehabilitation, Inc. (CANAR), state and local Chambers of Commerce, city councils, Hispanic Chambers of Commerce, the Oklahoma Legislative Black Caucus and community-based rehabilitation programs that impact counselor diversity issues within the DSA.

**4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).**

The DSA provides pre-employment transition services in its programs for youth and students and will work with agency staff to identify additional programs and services the staff wants to implement and provide in their local areas. Formal MOUs, contracts, and other agreements will be generated with partners to diversify and expand what can be provided to students in this area.

The DSA through an interagency agreement with the State Education Agency (SEA), will provide guidance to the schools in the state to encourage a focus on the Five Required Areas in the delivery of transition services that are required under the Individuals with Disabilities Education Act (IDEA). The DSA will continue to maintain and expand a collaborative relationship with the SEA in order to improve the delivery of PETS statewide.

**5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.**

The Employment Support Services (ESS) Unit is responsible for coordination and monitoring CRPs. An ESS technical assistant is assigned to every CRP with whom DSA contracts, with the responsibility to work with the CRP, counselor, employer and individual to ensure an effective working relationship is maintained and to resolve any disputes that may occur. The ESS Unit also provides training to the CRPs to keep them up-to-date on current best practices in the field.

The DSA conducted an Employment Support Services 360 analysis resulting in the need for supported or customized employment in some rural areas of the state, also a lack of CRP vendors in remote areas, including southeastern Oklahoma.

**6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.**

The DSA will focus upon the case process upfront to work with job seekers to provide employment information during the planning process before writing a plan for employment, thus engaging job seekers in their employment goals.

The DSA will target success by focusing upon comprehensive assessments as the core part of the employment plan. This will assist job seekers in focusing on their employability and skill deficiencies.

The DSA is setting higher expectations through the work with Coaching for VR Quality Outcomes, utilizing more resources statewide, and connecting with more national initiatives and programs such as the Talent Acquisition Portal (TAP). The DSA will also focus on the new statewide increase in the Basic Living Requirement, and intensive technical assistance through internships. In focusing on these higher expectations, the DSA has developed its business services model and established clear defined roles for job placement specialists.

The DSA is committed to meeting the performance accountability measures and working with core program partners, as outlined under section 116 of WIOA.

## **7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.**

Oklahoma is focused upon accessibility for all job seekers and businesses customers at all levels of Oklahoma Works. This initiative promotes a statewide vision, aligns and uses state data, expands effective partnerships, and modifies the use of resources and incentives to support an integrated vision. The Oklahoma Governor's Council for Workforce and Economic Development (GCWED) is playing a key role as the vehicle to establish the state vision for workforce and economic development integration.

Working with the GCWED, the system partners bring sharper focus on developing and employing more Oklahomans with disabilities. The DSA director is an ex-officio member of the GCWED. The DSA also has staff on the Workforce System Oversight Committee and State Youth Council, both are teams that support the work of the governor's council. Further, the DSA has representatives on each local workforce development board and youth committees. This involvement means the DSA is committed to working to develop creative solutions that expand and improve Oklahoma's workforce, thus increasing opportunities for people with disabilities to ensure complete access to employment statewide.

The DSA is leading Oklahoma's Workforce System towards enhanced accessibility. The objective is to provide equitable services to individuals with disabilities and to ensure that all Workforce System partners comply with the Americans with Disabilities Act (ADA).

### **Access for All Initiative**

The Access for All initiative within Oklahoma Works places a focus on recruitment, hiring, and promotion of individuals with disabilities in the state of Oklahoma's workforce. Access for All focuses on the Oklahoma Works system partners as well as employers in the state.



This initiative provides training, consulting, and resources to ensure that individuals with disabilities are intentionally included in efforts to achieve greater household wealth for Oklahomans. Access for All equips Oklahoma's Workforce System with knowledge and resources to make it more accessible to individuals with disabilities that utilize one-stop system programs in person, on the phone, or through the web.

To operationalize the Access for All initiative, a task force has been developing a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool will be accompanied by a system policy and a curated catalog of resources that can be tracked for enhanced professional development.

The Oklahoma Employment Security Commission (OESC), through the Oklahoma Works centers, develops and support increased employment opportunities for individuals with disabilities. OESC, through partnerships, improve service delivery for training and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and/or receiving Social Security disability benefits. Staff work daily with a variety of partners locally and across the state that provide services to individuals with disabilities and the general population either directly at the Oklahoma Works centers or through referrals to partner facilities.

Oklahoma Works center staff routinely refer individuals with disabilities to the DSA for more intensive training and job placement opportunities. DSA has six certified Social Security Administration (SSA) Work Incentive Counselors working and rotating between the Workforce Centers and DSA offices. Staff collaborates to assist job seekers receiving SSA benefits, specifically when referred by center staff; a DSA Benefits Planner will explain the importance of working at the highest possible level and above SSA's Substantial Gainful Activity benchmark. Job-seekers are provided general information concerning the impact of work on SSA disability benefits. Upon applying for VR services, these individuals would then also receive detailed reports illustrating the impact of work on other benefits and services the individual may be receiving, such as TANF, SNAP, UI compensation, Veteran's benefits, etc. DSA Benefits Planners address concerns of individuals with disabilities about the possibility of losing benefits and help them understand and maximize their work incentives.

## **Business and Employer Outreach**

Oklahoma's Workforce System recognizes opportunities to reach Oklahoma's businesses and employers with a powerful message of Access for All. Through relationships old and new, DSA and OKABT will lead the workforce partners in working to arrange and deliver training to businesses and employers that will reduce their hesitation to hire job seekers with disabilities and to identify ways to educate about the benefits of directly recruiting and hiring job seekers with disabilities. The creation of fact sheets and other concise deliverables will help businesses and employers to understand not only their obligations, but also the importance of hiring and promoting job seekers with disabilities.

DSA utilizes its ADA Coordinator as a resource to provide consultation, technical assistance, and site reviews to identify accessibility issues to all workforce system partners and other agencies, entities, and businesses and employers. The DSA ADA Coordinator provides training in various aspects of the Americans with Disability Act and the 2010 ADA Standards for Accessible Design to staff and supervisors of these entities as well. These services are available in order to advance the promotion of equal access for individuals with disabilities in programs, services, and buildings statewide.

The DSA delivers assistive technology for job seekers in their journey to employment. Assistive technology specialists complete a variety of different assistive technology assessments and evaluations for job seekers, business work sites, and system partners. The types of evaluations are home modifications, vehicle modifications, personal mobility needs, computer access, worksite modifications, and activities of daily living, communication school accommodations, and accessibility reviews. Assistive technology specialists focus on the reported obstacle, rather than the disability diagnosis. A big part of an assistive technology evaluation is to identify what the real problem or obstacle is for the individual job seeker or business work site.

### **One stop system certification policy standards for accessibility**

The one-stop system standards and certification criteria policy are designed to integrate physical and programmatic accessibility into the benchmark criteria for center certification. Utilizing the Americans with Disability Act (ADA) for physical accessibility and the Oklahoma Electronic and Information Technology Accessibility Law and Standards for accessibility of digital services. The Web Content Accessibility Guidelines (WCAG) 2.0, Levels A and AA, will be utilized for websites, web applications, and digital documents certification criteria and standards.

Ensuring opportunities for all is critical to meet the goal in creating an environment where people with disabilities have the same opportunities to participate in the workforce as do people without disabilities. As businesses and employers find that the labor pool is tightening, following through on these criteria and standards will ensure businesses and employers have access to more qualified people to fill needed positions.

## **8. How the agency's strategies will be used to:**

### **A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;**

**Goal 1:** Deliver quality opportunities for employment, independent living and economic self-sufficiency to Oklahomans with disabilities

**DVR Objective I:** Model Statewide Accessibility through Access for All

**Key Performance Measure:** Increase knowledge and awareness of accessibility issues

#### **Strategies:**

- Continue statewide workforce center accessibility reviews as needed. (DVR/SBVI)

- Conduct Accessibility training for the Oklahoma Works Workforce system. (DVR/SBVI)
- Increase consumer access to affordable assistive technology (AT) to help remove barriers to employment. (DVR/SBVI)
- Increase number of blind and visually impaired employed in state government by 10%. (SBVI)
- Conduct employer informational meetings on assistive technology in the workplace. (SBVI)

## **DVR Objective II: Expand public awareness and visibility**

**Key Performance Measure:** Develop Business strategies to reach employers

### **Strategies:**

- Implement Business Services Program and regional liaisons to improve employer relationships. (DVR)
- Implement Business Services Program *Business Concierge* to increase knowledge of free services offered to businesses from DRS. (DVR)
- Prepare elective trainings via webinar for DRS counselors in the areas of federal and state hiring practices; utilizing temporary employment services agency, House Bill 1340, on the job training, and “how to” of training soft skills and resume writing to consumers. (DVR)
- Market Business Services Program overview in DRS publications, employee newsletter and existing DRS social media outlets. (DVR)
- Present Business Services Program to civic organizations, workforce boards, local chambers of commerce and other business related entities. (DVR)
- Produce videos of consumer success stories utilizing social media. (DVR/SBVI)
- Create a Talent Acquisition Portal as a solution for counselors and businesses. (DVR)
- Connect with occupational liaisons from local businesses. (DVR/SBVI)
- Participate in community partner meetings and events. (DVR/SBVI)
- Market DRS/SBVI by distributing informational materials statewide. (SBVI)
- Participate in job fairs and events as a vendor. (DVR/ SBVI)
- Conduct radio interviews statewide. (SBVI)
- Maintain Services to the Blind and visually impaired Facebook page. (SBVI)

## **DVR Objective III: Continuously build relationships to deliver employment opportunities and prepare job-seekers with disabilities for the workforce through Oklahoma Works**

**Key Performance Measure:** Increase average annual wage of consumers with disabilities placed in employment

### **Strategies:**

- Alignment of strategic and state plans with the Governor's Vision: Oklahoma Works. (DVR/SBVI)
- Expand business relationships leading to career opportunities for consumers. (DVR/SBVI)
- Expand participation of consumers with disabilities enrolled in the OKJOBMATCH® system. (DVR/SBVI)

**DVR Objective IV: Create and leverage partnerships to maximize resources that reflect the needs of consumers with disabilities**

**Key Performance Measure:** Partnerships for successful consumer employment placements

**Strategies:**

- Career guidance and counseling based upon job opportunities and labor market statistics. (DVR/SBVI)
- Engage consumers in preparation for employment. (DVR/SBVI)
- Consumer Employment Outcomes. (DVR/SBVI)
- Community Outreach. (DVR/SBVI)
- Consumer's soft skills. (DVR/SBVI)
- Expand mental health partnerships. (DVR/SBVI)
- Input from blind consumer groups on their perceptions of quality outcomes. (SBVI)

**Goal 2: Produce results that are accountable to the public and our customers**

**DVR Objective I: Market the mission, vision and values statewide**

**Key Performance Measure:** Increase client access to employment services

**Strategies:**

- Distribute labor market information to field staff of rehabilitation agencies so they can create an informed and ready workforce to meet the needs of business. (DVR/SBVI)
- Develop greater awareness in the business community of the value of an undiscovered pool of ready and talented workers among persons with disabilities. (DVR/SBVI)
- 
- Effectively engage and work with all community partners such as Workforce, higher education, state executive branch, etc., who have common interests and goals related to employment. (DVR/SBVI)

**DVR Objective II: Effectively manage and employ state and federal policies, procedures and productivity requirements**

**Key Performance Measure:** Increase number of successful employment outcomes for consumers with disabilities

**Strategies:**

- Work to open Priority Groups or release clients off waitlists. (DVR/SBVI)
- Collect and use information from surveys, studies and data to evaluate program effectiveness and implement improvements. (DVR/SBVI)
- Implement Business Services Program and regional liaisons to improve employer relationships (DVR/SBVI).

**DVR Objective III: Provide quality services with all decisions supported by information that is factual, available to all, and consistent**

**Key Performance Measure:** Quality decisions for consumer reaching employment goal

**Strategies:**

- Strengthen consumer job readiness. (DVR/SBVI)
- Produce quality vocational evaluations and assessments of consumers. (DVR/SBVI)
- Produce quality Psychological Evaluations and Assistive Technology Reports. (DVR/SBVI)
- Focus on working with blind consumers in the office setting and staff impact on consumer's life. (SBVI)

**Goal 3: Strengthen our Workforce**

**DVR Objective I: Build careers and retain talented and engaged employees**

**Key Performance Measure:** Improve retention and attrition rates

**Strategies:**

- Increase employee accountability for results. . (DVR/SBVI)
- Improve recruitment of quality applicants, maintaining Certified Rehabilitation Counselor standard. . (DVR/SBVI)
- Increase academic development. . (DVR/SBVI)
- Competitive Salaries. . (DVR/SBVI)
- Increase Academic development with emphasis upon informed choice and skills in blindness training. (SBVI)

**DVR Objective II: Provide a safe, accessible and adequately equipped work environment**

**Key Performance Measure:** DRS worksites meet ADA accessibility requirements

**Strategies:**

- Utilize DRS Assistive Technology Unit and DRS ADA coordinator to guide the process. (DVR/SBVI)

**DVR Objective III: Develop new and enhance existing training, mentoring and educational development opportunities.**

**Key Performance Measure:** Promote Educational Opportunities that lead to advances in employment.

**Strategies:**

- Inform staff and community of the benefits of working with DRS. (DVR/SBVI)
- In-depth training on blindness. (SBVI)
- Provide opportunities for formal mentoring agency wide. (DVR/SBVI)
- Provide opportunities for employees to attend HCM courses. (DVR/SBVI)
- Implement New Employee Blindness Orientation. (SBVI)

**DVR Objective IV: Deliver leadership development opportunities to increase organizational growth.**

**Key Performance Measure:** Increase employee engagement and leadership development

**Strategies:**

- Provide a new employee academy. (DVR/SBVI)
- Identify leadership programs to enhance staff development, (DVR/SBVI)
- Develop and implement a Supervisor Core Competency Academy. (DVR/SBVI)
- Develop and implement a Supervisor Core Competency Academy. (DVR/SBVI)

**Goal 4: Strengthen our Infrastructure**

**DVR Objective I: Produce progressive policy changes**

**Key Performance Measure:** Improve business processes

**Strategies:**

- Streamline and implement policy change according to WIOA legislation requirements. (DVR/SBVI)

**DVR Objective II: Implement results on IT technology**

**Key Performance Measure:** Improve business processes

**Strategies:**

- Utilize IT resources and tools to improve or streamline service delivery. (DVR/SBVI)
- Create and implement an electronic filing system for travel reimbursement. (DVR/SBVI)
- Implement state and agency business strategies and requirements implemented through Information Technology Oversight Committee. (DVR/SBVI)

- Work with Alliance, AWARE case management provider to develop an online application for consumer access and data sharing process in partnership with Oklahoma Works. (DVR/SBVI)

## **B. support innovation and expansion activities; and**

The DSA will support all innovation and expansion activities, in collaboration with the SRC. The activities will include:

- Executive Committee: Outreach to businesses and disability organizations to educate on DSA programs, services, and activities and role of SRC; Participation with DSA Workforce System Activities.
- Program and Planning Committee: Data and Findings of Customer satisfaction Surveys and State performance accountability measures/assessment.
- Policy and Legislative Committee: Policy public hearings; Promotion of client success stories; Meet the Legislative Candidates forum; Collaboration on legislative packets for state and federal legislative visits and Oklahoma Disability Awareness Day at State Capitol.
- Transition Committee: Participation on Oklahoma Transition Institute; Update the Transition Planning Folder and tools for disability support organizations; Collaborate on Statewide Assessment on needs assessments of individuals with disabilities for transition career services and pre- employment transition services, including services under IDEA.

## **C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.**

The DSA will utilize the following strategies to overcome any barriers to accessing the vocational rehabilitation and supported employment programs.

- Inadequate transportation and lack of information about existing transportation are identified barriers to individuals with disabilities traveling to and from VR Services, and accessing training, education, and employment through Supported Employment Services.
- The Governor's Oklahoma United We Ride (UWR) Council is composed of state agency members and advisors who bring a vast range of knowledge and expertise to discuss transportation issues and provide insight into the impacts of transportation barriers in the State of Oklahoma. The Council is using the framework of HB 1365 which establishes the Office of Mobility and Public Transit as a roadmap to fulfill the Governor's mandates within the Executive Order to assess passenger transportation services in Oklahoma to maximize their availability, efficiency, and quality. The council has and will continue to provide input to the Oklahoma Department of Transportation for the Oklahoma Public Transit plan.

- Oklahoma is focused upon accessibility for all job seekers and businesses and employer's work sites throughout all levels of Oklahoma Works. Working with the Governor's Council for Workforce and Economic Development (GCWED), system partners bring sharper focus on developing and employing more Oklahoman's with disabilities.
- To help build a foundation for the Access for All initiative, the Oklahoma Department of Rehabilitation Services (OKDRS) and Oklahoma ABLE Tech (OKABT), partner to provide regional Access for All technical assistance in the form of, academies, webinars, newsletters, and weekly tips statewide. To operationalize the Access for All initiative, a task force has been developing a five-star evaluation model with supporting resources to be used for self-assessment and continuous improvement of the accessibility of the workforce system in the areas of Customer Service, Outreach, Physical Accessibility, and Training (with programmatic accessibility embedded throughout the framework). The tool will be accompanied by a workforce system policy and a curated catalog of resources that can be tracked for enhanced professional development.

**p. Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:**

**1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:**

**A. Identify the strategies that contributed to the achievement of the goals.**

The DSA Divisions of Vocational Rehabilitation and Services to the Blind and Visually Impaired outcomes, goals and indicators which pertain to the agency's management of the vocational rehabilitation and supported employment programs and is outlined as follows.

The DSA began working under new regulations outlined by the WIOA. The new performance measures are:

**Adult Measures**

1. Employed in the 2nd quarter after exit
2. Employed in the 4th quarter after exit
3. Median earnings in the 2nd quarter after exit
4. Credential attainment
5. Skill gains
6. Service to employers/business



## Youth Measures

1. Employed or in education or training in the 2nd quarter after exit
2. Employed or in education or training in the 4th quarter after exit
3. Median earnings in the 2nd quarter after exit
4. Credential attainment
5. Skill gains
6. Service to employer/business

The DSA will continue efforts to focus on the case process upfront to work with job seekers and provide employment information during the planning process, before writing a plan for employment; engaging job seekers in their employment goals. The DSA will target success by focusing upon comprehensive assessments as the core part of the employment plan. The DSA continues to focus on Quality Outcomes, by utilizing more resources statewide, and connecting with more national initiatives and programs such as the Talent Acquisition Portal (TAP).

The DSA has implemented a referral module statewide, that allows counselors time initially to work with jobseekers to assure individual plans reach successful employment outcomes. Although not mandatory at this time, it is proving to be effective in areas in which the DSA receives a significant number of walk in applicants.

For analysis and tracking towards meeting goals and priorities of the VR and the Supported Employment programs, the Program Standards Section, Programs Managers, and Field Service Coordinators conduct regular case reviews. The VR Case Management Liaison works with the Program Standards Section on meeting federal regulations issues, unit staff in group or individual trainings as needed, and new employee training of new counselors.

The Program Standards Section case review process assesses for federal regulation requirements of case management ensuring counselors are following regulations to meet ninety percentile. The DSA Administration and the VR Case Management Liaison review results to determine if training is necessary to enhance understanding and knowledge of federal regulations.

The DSA Supported Employment program conducts annual audits of vendors to review compliance of programs to meet quality standards and case documentation requirements. Contracted vendors must submit a mid-year and end of year report that details their progress towards meeting standards. Consumers are given the opportunity to evaluate providers at time of case closure. The DSA Employment Support Services unit will begin initiating a report card that provides a snapshot of vendor's performance allowing for consumer informed choice. The Performance Standards Section will also begin to include an evaluation of vendors on the closed cases survey.

Strategies that contributed to the achievement of meeting goals and priorities include;

- The waiting list is reviewed monthly by program, fiscal and administrative staff to determine the current level of existing resource capacity. The goal is to be able to clear priority group 1 monthly and if possible to reduce the waiting list for priority groups 2 & 3. Releases from the waiting list are based on priority group ranking and applications with the earliest date are removed first.

## **B. Describe the factors that impeded the achievement of the goals and priorities.**

Factors that impeded the achievement of meeting goals and priorities include;

- DSA business services model underdeveloped in focusing VR program goals and priorities
- DSA job placement specialists do not have defined, clear roles
- DSA job seekers employability and skill deficiencies
- DSA has been on Order of Selection that has contributed to less employment outcomes overall. It is anticipated that this will impact the DSA's application, plan, and successful outcome totals for the next 2-3 years.

## **2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:**

### **A. Identify the strategies that contributed to the achievement of the goals.**

Strategies that contributed to the achievement of meeting goals and priorities include;

- Increased number of contracted CRPs with DSA to assist individuals with significant barriers to employment achieve a successful employment outcome
- DSA's partnership with DDS and State Employment Leadership Network (SELN)
- DSA's partnership with ODMHSAS, including the pilot employment services contract, to assist individuals with serious mental illness achieve a successful employment outcome

### **B. Describe the factors that impeded the achievement of the goals and priorities.**

Factors that impeded the achievement of meeting goals and priorities include;

- Lack of DSA contracted CRPs in rural areas of the state
- Lack of joint contracted DSU/DDS CRPs
- DSA remains under Order of Selection for all priority groups

## **3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.**

	Vocational Rehabilitation Program			
	Program Year:		Program Year:	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit) <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit) <sup>[1]</sup>	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains				

#### **4. How the funds reserved for innovation and expansion (I&E) activities were utilized.**

The DSA complies with innovative and expansion activities by ensuring improved efficiency and service delivery through a system wide approach. Innovation and Expansion during FY 2019 totaled \$0.00. Projects include, but are not limited to the following:

- Club Houses - Transitional Employment
- Educational Sponsorship
- Student Awards Banquet
- Conversational Spanish Classes
- Parent Advisory Board pilot
- Job Readiness Boot Camp
- Blood bank account for DRS
- Brainstorming for Success - A Transition Forum
- Walgreens Experiential Learning Project pilot
- Business Advisory Council
- Job Placement Expansion Tribal VR

## **q. Quality, Scope, and Extent of Supported Employment Services.**

Include the following:

### **1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.**

DSA remains committed to the provision of quality services to individuals with the most significant disabilities. Quality of services is based on Supported Employment outcome based contracts.

#### **Quality**

Services and/or milestones are pre authorized and monitored by the counselor working with the individual. In order to be paid, the CRP must submit evidence that each outcome has been achieved. Some outcomes include individual and employer satisfaction surveys. The employee survey is designed to reflect satisfaction with the job and any concerns. The employer survey is designed to reflect evaluation of the individual's job performance, stability, and training needs.

There are contract performance measures defined in the contract. There is a "Minimum Contracts Standards" section which defines standards for average work hours and average wages at closure. This section also defines requirements for staff qualifications such as base salary paid and completion of required training.

DSA is committed to providing excellent training for CRPs to ensure quality services for individuals. DSA has contracted with the University of Oklahoma since 1987 to provide training for CRP staff. The Employment Consultant (EC) must complete the basic EC training within 6 months of hire. Each EC must also successfully complete the following additional training courses within 12 months of hire: Social Security Work Incentives; Effective Training at Work; Job Development/Marketing; Job Club;

Online Introduction to Positive Behavior Supports in the Workplace (prerequisite for positive behavior supports and instructional supports); Positive Behavior in the Workplace, customized employment and instructional supports. Following completion of the required training listed above, six hours of continuing education is required each year. The DSA staff also provides quarterly training and two additional advanced trainings annually to CRPs to keep them up-to-date on current best practices.

DSA monitors contract compliance, provides an outcomes based report on data drawn from the AWARE case management program. DSA reports to CRPs on minimum contract standards and whether those standards have been met or will require a plan for improvement. Every CRP has a TA who helps resolve service delivery problems and monitors for contract compliance on an annual basis.

## **Scope**

The DSA contract allows CRPs to serve individuals with the most significant disabilities without restriction on disability type. The majority of individuals served in Supported Employment are individuals with intellectual disabilities and/or serious mental illness. Individuals with other types of disabilities are being served as well. DSA continues to seek methods to increase participation of individuals with all types of disabilities in supported employment programs. ESS provides training on Supported Employment to DSA staff in an ongoing effort to reach underserved and unserved populations.

The Supported Employment contract offers two levels of support; regular rate, and highly challenged rate for those with greater support needs. If the DSA counselor determines the individual will require additional support to be successful, milestones can be authorized at the highly challenged rate.

## **Extent**

The DSA issues annual Supported Employment contracts serving individuals with the most significant disabilities. The figures hinge on the support of the state to match federal dollars necessary to provide Supported Employment to individuals with the most significant disabilities.

## **2. The timing of transition to extended services.**

### **Timing**

Extended services are a continuation of ongoing support services provided to individuals with the most significant disabilities. After 18 months of onsite training and supports, the team identifies the individual's needs and develops a plan for the transition to extended services

# VOCATIONAL REHABILITATION CERTIFICATIONS AND ASSURANCES

## Certifications

Name of designated State agency or designated State unit, as appropriate

**Oklahoma Department of Rehabilitation Services**

Name of designated State agency

Full Name of Authorized Representative: **Melinda Fruendt**

Title of Authorized Representative: **Executive Director**

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA,<sup>14</sup> and its supplement under title VI of the Rehabilitation Act<sup>15</sup>; Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)<sup>16</sup> agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan<sup>17</sup>, the Rehabilitation Act, and all applicable regulations<sup>18</sup>, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan<sup>19</sup>, the Rehabilitation Act, and all applicable regulations<sup>20</sup>, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan; Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

8. The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## **Certifications**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:

1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

(a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

(b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):

(A) is an independent State commission.

- (B) has established a State Rehabilitation Council.
- (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
- (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
- (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No)
- (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No)
- (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan.
- (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
- (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
- (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- (m) the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:

- (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
- (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .
- (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)
- (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.



- (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act .
- (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- (g) provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- (h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.
- (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs
- (j) with respect to students with disabilities, the State,
  - (i) has developed and will implement,
    - (A) strategies to address the needs identified in the assessments; and
    - (B) strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
  - (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

- (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- (c) The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. (a) Financial Administration of the Supported Employment Program: The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

(b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing

supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. (a) Provision of Supported Employment Services: The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

(b) The designated State agency assures that:

- i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
- ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

## **Appendix 1. Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (second quarter after exit);
- Employment (fourth quarter after exit);
- Median Earnings (second quarter after exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a

reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (second quarter after exit);
- Employment (fourth quarter after exit);
- Median Earnings (second quarter after exit);

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (second quarter after exit);
- Employment (fourth quarter after exit);
- Median Earnings (second quarter after exit);
- Credential Attainment Rate;

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

	<b>Title I – Adult Program</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	66.70		66.70	
Employment (Fourth Quarter after Exit)	67.00		66.70	
Median Earnings (Second Quarter after Exit)	5,200.00		5,200.00	
Credential Attainment Rate	64.50		64.50	
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

	<b>Title I – Dislocated Worker Program</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	75.00		75.00	
Employment (Fourth Quarter after Exit)	73.90		73.90	
Median Earnings (Second Quarter after Exit)	7,600.00		7,600.00	
Credential Attainment Rate	59.10		59.10	
Measurable Skill Gains	Baseline	Baseline	Baseline	Baseline

	<b>Title I – Youth Program</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>21</sup>	66.50		66.50	
Employment (Fourth Quarter after Exit) <sup>22</sup>	62.70		62.70	
Median Earnings (Second Quarter after Exit)	\$3,000		\$3,000	
Credential Attainment Rate	46.40		46.40	
Measurable Skill Gains	40.91		40.91	

<sup>21</sup> For Title I Youth programs, employment, education or training

<sup>22</sup> For Title I Youth programs, employment, education or training

	<b>Title II – Adult Education and Family Literacy Act Program</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	44.00		44.00	

	<b>Wagner-Peyser Act Employment Service Program</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	63.50		63.50	
Employment (Fourth Quarter after Exit)	64.00		64.00	
Median Earnings (Second Quarter after Exit)	5,200.00		5,200.00	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	<b>Vocational Rehabilitation Program</b>			
	Program Year: 2020		Program Year: 2020	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit) <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter after Exit) <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter after Exit) <sup>23</sup>	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate <sup>22</sup>	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains				

23 For the VR program, these indicators are Not Applicable for PY 2020 and PY 2021; however, they will be applicable for PY 2022 and PY 2023.

	<b>All WIOA Core Programs</b>			
	Program Year: 2020		Program Year: 2021	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

<b>Additional Indicators of Performance:</b>
1.
2.
3.
4.
5.
6.